DEFORE THE CIVIL SERVICE COMMISSION OF THE COUNTY OF LOS ANGELES JOSEPH SCULLY, HEARING OFFICER

TRANSCRIPT OF PROCEEDINGS

Los Angeles, California

Wednesday, September 27, 2017

Reported by:

AMANDA KARMANN HEARING REPORTER

1	BEFORE THE CIVIL SERVICE COMMISSION
2	OF THE COUNTY OF LOS ANGELES
3	JOSEPH SCULLY, HEARING OFFICER
4	
5	
6	IN THE MATTER OF THE DISCHARGE,) EFFECTIVE SEPTEMBER 14, 2016, OF:)
7	EFFECTIVE SEFTEMBER 14, 2010, OF.)
8	CAREN MANDOYAN,)
9	APPELLANT,)) CASE NO. 16-276
	FROM THE POSITION OF)
10	DEPUTY SHERIFF, SHERIFF'S DEPARTMENT,)
11)
12	RESPONDENT.)
13	· <u></u> /
14	
15	
16	
17	Transcript of Proceedings, taken at
18	500 West Temple Avenue, Los Angeles, California,
19	Room 528, beginning at 9:14 a.m. and ending
20	at 4:36 p.m., on Wednesday, September 27, 2017,
21	heard before Joseph Scully, Hearing Officer,
	reported by Amanda Karmann, Hearing Reporter.
22	
23	
24	
25	

1	APPEARANCES:
2	
3	For the Department:
4	L.A. COUNTY SHERIFF'S DEPARTMENT BY: CHRISTINE ROAM
5	Advocacy Unit 4900 S Eastern Avenue, Suite 101
6	Commerce, California 90040 323-890-5413
7	Cdroam@lasd.org
8	
9	For the Appellant:
10	BY: MICHAEL A. GOLDFEDER, ESQ. 400 Continental Boulevard, 6th Floor
11	El Segundo, California 90246 310-374-7011
12	michaelgoldfeder@hotmail.com
13	
14	Also present:
15	Peter M. Bollinger
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

					1
1		<u>I I</u>	N D E X		
2					
3	DEPARTMENT'S	DIDECE	CDOGG.	DEDIDECE	DEGDOGG
4	WITNESSES:	DIRECT	CROSS	REDIRECT	RECROSS
5		9	34	63	
6	(Further)			68	
7			71	168	188
8					
9	APPELLANT'S WITNESSES:	DIRECT	CROSS	REDIRECT	RECROSS
10	 .		 .		9
11		191	197	200	
12		202	213		
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					

ĺ			
1	<u>E X F</u>	HIBITS	
2			
3	DEPARTMENT'S EXHIBITS:	MARKED FOR IDENTIFICATION	
4	EMILDI 10.	IDENTIFICATION	IN EVIDENCE
5	32 - Inter	215	
6	Incer		
7			
8			
9	APPELLANT'S EXHIBITS:	MARKED FOR IDENTIFICATION	RECEIVED IN EVIDENCE
10	EAHIBI15.	IDENTIFICATION	IN EVIDENCE
11	53 - E-mails	36	
12	54 - POE Form	80	
13	55 - Text Messages	89	
14	56 - Text Messages	94	
15	57 - Text Messages	101	
16	58 - Phone Record	106	
17	59 - In-service Sheet	114	
18	60 - 's ion	181	
19	Extra Narrative		
20	61 - Caren Mandoyan's Office Correspondence	205	
21	Memorandum		
22			
23			
24			
25			

1	Los Angeles, California; Wednesday, September 27, 2017
2	9:14 a.m.
3	
4	HEARING OFFICER SCULLY: Okay. All right. Good
5	morning. We're on the record in the matter of
6	Caren Mandoyan, case number 16-276. All right.
7	So, Sergeant Roam informed me that we have a
8	witness, , to testify this morning.
9	MS. ROAM: Yes, sir.
10	HEARING OFFICER SCULLY: And we are in the middle
11	of cross-examination no. I don't think
12	cross-examination has started yet, has it?
13	MS. ROAM: We never started, sir.
14	MR. GOLDFEDER: It has not.
15	HEARING OFFICER SCULLY: Okay. Any objection to
16	the witness going forward now until I
17	understand won't be here for another half an
18	hour or so?
19	MR. GOLDFEDER: The word is that she's in traffic
20	and delayed.
21	Is that what Department is saying?
22	MS. ROAM: That's correct.
23	MR. GOLDFEDER: Let me go forward with the next
24	witness, but before we do that, I want to just take a few
25	minutes to handle this purported expert witness for

tomorrow -- actually for Friday. We've got a little time here.

MS. ROAM: I would ask that we take

and then we can deal with the expert
witness after.

2.0

2.5

HEARING OFFICER SCULLY: All right. Well, the expert witness might take a little bit of time, although not necessarily a lot. Basically, I glanced at the motion or whatever it is -- was it a motion? I don't have it here with me now.

MS. ROAM: I can provide you with a hard copy.

HEARING OFFICER SCULLY: And there was no written opposition; correct, Mr. Goldfeder?

MR. GOLDFEDER: The only opposition is going to be that this code section did not permit this person to testify, but I did not file any written opposition because as a matter of law that person is not capable of testifying other than criminal court.

HEARING OFFICER SCULLY: Okay. Well, I think I would like to address that issue later because I think it's a -- something that needs our full attention of both sides and myself, and we're getting a little late start here, so let's go with the witness, and then perhaps at the end of the day we'll save some time and we can deal with the expert witness issue.

1	That way you'll at least be able to tell the
2	witness whether she should be here or not be here on
3	Friday. Or if she is going to be here, there's a narrow
4	scope of what she would be testifying to because part of
5	what I'll ask you to do is give us an offer of proof, and
6	then once we get that we can deal with the objections to
7	that.
8	MS. ROAM: Okay.
9	HEARING OFFICER SCULLY: All right.
10	MR. GOLDFEDER: That's fine. Thank you, your
11	Honor.
12	HEARING OFFICER SCULLY: So the next witness
13	what is her name? ?
14	MS. ROAM: Yeah.
15	HEARING OFFICER SCULLY: ?
16	MS. ROAM:
17	HEARING OFFICER SCULLY: Okay. Stand and raise
18	your right hand, please.
19	
20	,
21	produced as a witness by and on behalf of the Department
22	and having been first duly sworn by the Hearing Officer,
23	was examined and testified as follows:
24	
25	HEARING OFFICER SCULLY: Thank you.

1	Sit, state and spell your full name. You can
2	have a seat.
3	THE WITNESS: , last
4	name .
5	HEARING OFFICER SCULLY: Were there two N's in
6	your
7	THE WITNESS: That's correct, sir.
8	HEARING OFFICER SCULLY: name? Thank you for
9	answering promptly, but when you when you're listening
10	to the questions from the attorneys, be patient, let them
11	finish their question and then give your answer so that
12	you're not answering and speaking while they're speaking,
13	because the court reporter can't take two of you speaking
14	at the same time; okay?
15	THE WITNESS: I understand.
16	HEARING OFFICER SCULLY: Thank you.
17	Sergeant Roam, this is Department's witness;
18	correct?
19	MS. ROAM: That's correct.
20	
21	DIRECT EXAMINATION
22	BY MS. ROAM:
23	Q Good morning
24	A Good morning.
25	Q

1	HEARING OFFICER SCULLY: You just did it again.
2	BY MS. ROAM:
3	Q You work for the Sheriff's Department; is that
4	correct?
5	A That's correct.
6	Q How long have you been so employed?
7	A Since March, 2006.
8	Q And what is your current rank and assignment?
9	A I'm a deputy sheriff with the LA County Sheriff's
10	Department, currently assigned to West Hollywood Station
11	patrol.
12	Q Okay. We have a court reporter here today, and
13	you have a tendency to talk really fast and kind of run
14	your words together, so just to help the reporter, could
15	you slow down just a little bit and make sure you keep
16	your voice up; okay?
17	A Yes, ma'am.
18	Q Thank you. How long have you been assigned to
19	West Hollywood Station?
20	A Since August, 2013.
21	Q Do you recall being interviewed by
22	in relation to this case?
23	A Yes, ma'am.
24	Q And there's a binder in front of you, and if you
25	would open it to a tab marked 8, and take a look at that

1	document.	•
2		Does that appear to be a copy of your
3	Internal	Affairs interview transcript?
4	А	Yes, ma'am.
5	Q	Have you had an opportunity to review this
6	transcrip	pt?
7	А	I did, last time before I came.
8	Q	I want to ask you some questions about your
9	relations	ship with and Caren Mandoyan.
10		Do you know ?
11	А	Yes, I do.
12	Q	How long have you known her?
13	А	Very long time, since I was working Twin Towers
14	as a cust	tody assist.
15	Q	Can you give us an estimate of when you worked
16	Twin Towe	ers with her?
17	А	I'm guessing maybe 2007, 2008.
18	Q	When you worked custody together, were you guys
19	friends?	
20	А	No.
21	Q	And did you work together at West Hollywood
22	Station?	
23	А	Very brief period.
24	Q	Okay. And do you recall when you worked together
25	with her	at West Hollywood?

1 Α Yes, ma'am, when we were assigned at 2 Universal Studios. Okay. Can you give us a time frame? 3 Q I'm guessing April 2016. Α 4 5 Okay. And how long did you work with her? Three, four months. 6 Α 7 And during that time were you guys -- would you Q 8 consider yourselves friends? Α Yes, ma'am. Did you develop a friendly -- a friendship? 10 0 11 Α Correct. 12 Okay. And tell me what period of time that friendship was in place? 13 14 Since she started -- she came back. 15 injured on duty. She came back and she was assigned 16 Universal Studios. We worked together for quite a period of time at the same shift until I was told that she 17 18 doesn't like me and she says bad things behind my back and 19 then I stopped talking to her. 2.0 Q Okay. Who told you that? 21 Α Deputy Mandoyan. 22 Okay. So we're trying to pin down a time frame 23 here. 24 When did you guys work CityWalk together? 2.5 Not exactly sure, when she returned back to work. Α

1	I'm assuming April 2016, because I moved there
2	November 2015, and then she came in April or March or
3	February in the beginning of the year, 2016.
4	Q Okay. Sometime in the beginning of 2016?
5	A Correct, if I'm not mistaken.
6	Q When did your friendship with her end?
7	A When I found out that she's not being a loyal
8	friend.
9	Q Okay. Time period?
10	HEARING OFFICER SCULLY: So when she asked you
11	that question, I have no idea when that might be. I mean,
12	it could be 2010, 2001, I mean, it could be any date. So
13	when she's asking when, she she's asking for a calendar
14	date.
15	THE WITNESS: I don't remember.
16	BY MS. ROAM:
17	Q Okay. , is there anything that
18	might help refresh your recollection as to when you and
19	worked together?
20	A So we started working together when she returned
21	back to work when she was injured. So that would be the
22	beginning date when we developed started working the
23	same shift, and the time frame when the relationship ended
24	would be probably September, October of 2016.
25	Q Okay. So can you how long did the friendship

1	last? Was it a month, two months, was it more?
2	A Maybe three months.
3	Q Okay. And, so do you know what a deputy daily
4	worksheet is?
5	A Yes, ma'am.
6	Q And can you tell us what it is?
7	A Daily deputy worksheet is a document that shows
8	exactly what kind of calls a deputy handles, how they
9	clear calls, and the contact that they make.
10	Q If I showed you deputy daily worksheets that
11	showed you and partnered up, would that help
12	refresh your recollection as to when the two of you
13	started working together?
14	A Absolutely.
15	Q Okay.
16	MS. ROAM: And I'm just going to hand
17	I'm not going to mark it. I just want
18	to hand her some deputy daily worksheets to see if those
19	refresh her recollection.
20	MR. GOLDFEDER: Are we going to get a copy over
21	here?
22	MS. ROAM: Let me show those to Counsel first.
23	MR. GOLDFEDER: So they are not exhibits in the
24	book?
25	MS. ROAM: They're not exhibits. I would be

happy to make copies for you, Mr. Goldfeder, if you like. 1 2 MR. GOLDFEDER: Well, I'll stipulate they worked these stated days together. No reason to be cluttering up 3 with documents. If you want to state those dates they 4 5 worked together, that's fine. 6 MS. ROAM: Okay. The Department will accept that 7 stipulation. The dates on the deputy daily worksheets are 8 9 December 27th of 2014, January 9th of 2015, January 25th of 2015, January 29th of 2015, and March 28th of 2015. 10 11 BY MS. ROAM: 12 And by looking at those deputy daily worksheets, did that refresh your recollection as to the time period 13 14 worked together? that you and 15 Yes, ma'am. Α And that would be the time period that the two of 16 you were friends? 17 18 Α Correct. 19 Q And then --2.0 HEARING OFFICER SCULLY: Which is -- so that's December of 2014 to --21 22 MS. ROAM: March of 2015. 23 HEARING OFFICER SCULLY: Okay. 24 BY MS. ROAM: 2.5 Now, after the two of you were no longer

partnered up, how long was it that you were no longer 1 2 friends with her? From March to -- I'm trying to remember the date 3 when I went back to West Hollywood. So that would be 4 November 2016. 5 6 Okay. So you're not currently friends; is that 7 correct? 8 Α Correct. 9 Now, I want to go back to the time when you were 10 friends, when you were working together --11 HEARING OFFICER SCULLY: I'm sorry. I want to 12 clarify the last answer. What is the November 2016, what is the significance of that? 13 14 THE WITNESS: I returned back to West Hollywood 15 Station from Universal Studios. HEARING OFFICER SCULLY: Does that mean in 16 17 March of 2015 to November of 2016 you were working in the 18 same unit as , but you weren't friends with 19 her? 2.0 THE WITNESS: No, sir. She transferred out from 21 that unit. She went to transportation -- TSP, if I'm not 22 mistaken. 23 HEARING OFFICER SCULLY: All right. Well, what 24 was the state of your friendship with after 2.5 March of 2015?

1	THE WITNESS: Professional work.
2	HEARING OFFICER SCULLY: So not personal friends?
3	THE WITNESS: Correct.
4	HEARING OFFICER SCULLY: Just a
5	THE WITNESS: Colleague.
6	HEARING OFFICER SCULLY: work colleague that
7	was basically kept at an arm's length distance from you,
8	as far as your personal friendships; is that correct?
9	THE WITNESS: Correct.
10	BY MS. ROAM:
11	Q Okay. So I want to go back to the time period
12	when you were friends this December through March
13	December of 2014 through March of 2015.
14	Did ever confide in you about her
15	relationship with Caren Mandoyan?
16	MR. GOLDFEDER: Objection. Calls for hearsay.
17	No foundation, since she hasn't testified on cross yet.
18	HEARING OFFICER SCULLY: Well, overruled.
19	THE WITNESS: Yes, ma'am.
20	BY MS. ROAM:
21	Q Okay. What did she tell you?
22	A She told me that she would like to end the
23	relationship, that he's not understanding, he doesn't want
24	to leave her alone.
25	Q Okay. Did she tell you anything else?

1	A Yes, ma'am. She said that he showed up to her
2	house and tried to get in her house.
3	Q What did she tell you about that?
4	A She said that he she told him that she no
5	longer wanted to be with him and then he got very
6	emotional and went to her house and tried to get in her
7	house through the balcony.
8	Q Did she tell you specifically how he attempted to
9	get in her house?
10	A I don't remember.
11	Q Okay. Did ever tell you she was trying to
12	keep things friendly between her and Caren Mandoyan?
13	MR. GOLDFEDER: Objection. Leading.
14	HEARING OFFICER SCULLY: Overruled.
15	THE WITNESS: She did.
16	BY MS. ROAM:
17	Q What did she tell you?
18	A She told me that she can be very abrupt with her
19	decision to say, We're done completely, because she was
20	scared.
21	Q Did she say what she was scared about?
22	A No, ma'am.
23	Q Okay. Did she tell you that she was hoping that
24	the Appellant would just move on?

speculation. 1 HEARING OFFICER SCULLY: Why don't you just tell 2 3 us everything that you can remember about what she told you; okay? 4 5 THE WITNESS: I don't remember, ma'am. 6 BY MS. ROAM: 7 Okay. Do you know when their relationship ended? A I wouldn't be able to tell. 8 9 During your interview with Q 10 did you tell him when their relationship ended? 11 At that time I had a very fresh recollection. 12 probably -- can I refer to --13 So turning to Department's Exhibit 8, Okay. 14 specifically page 4, and just for context, if you just 15 read to yourself the very bottom of page 3 and spilling 16 over to top of page 4, and see if that refreshes your 17 recollection as to what you told 18 Okay, ma'am. A Okay. Does that refresh your recollection as to 19 when their relationship ended? 20 21 A Yes, ma'am. 22 When was that? 23 At that time when we were friends it was still 24 ongoing, so I don't know exactly when it ended, because I 25 never found out about the end of the relationship.

1	Q Okay. So when you told that
2	their relationship ended at the end of 2014, was that the
3	truth?
4	A It was the truth, ma'am. It was started to
5	end. It didn't end because she kept in communication with
6	him.
7	Q Okay. And who ended the relationship?
8	A She told me told me she did.
9	Q Okay. Now
10	HEARING OFFICER SCULLY: Wait a minute. You just
11	said in this testimony in the book in the transcript:
12	"I did not know when it completely
13	ended."
14	And then you also said in response to her
15	questions it was a process, but you don't actually know
16	when it ended, and now you just told us told
17	you it ended
18	THE WITNESS: I will rephrase it.
19	I did not know when it ended completely. I knew
20	the process of ending it started, and that's when she told
21	me.
22	HEARING OFFICER SCULLY: And she told you what?
23	THE WITNESS: That she is attempting, trying to
24	be nice about it and end the relationship.
25	HEARING OFFICER SCULLY: Which you already

mentioned in your prior testimony? 1 2 THE WITNESS: Correct, sir. HEARING OFFICER SCULLY: Okay. So nothing new, 3 you're just repeating what you've already said; right? 4 5 THE WITNESS: That's correct, sir. BY MS. ROAM: 6 7 tell you anything that was Now, did 8 happening as she was trying to end this relationship with 9 Caren Mandoyan? You already talked about him trying to 10 get into her apartment. Was there anything else she told 11 you that was happening? 12 MR. GOLDFEDER: Objection. Now she's leading the 1.3 witness. 14 HEARING OFFICER SCULLY: Well, you know, I don't 15 mind if you exhaust her testimony, her knowledge, but I asked her: 16 17 "Tell us everything he told you." And she said: 18 "I told you." 19 2.0 So you can't use leading questions to kind of 21 prompt her to agree with you; okay? I mean, particularly 22 since she's not -- this is all hearsay, and I know hearsay 23 is admissible, but it's still hearsay. 24 So I want to -- I would like to focus on witnesses who have personal knowledge, not -- her memory 2.5

```
hasn't demonstrated to be very strong, which by her own
1
2
      admission, and she demonstrated it here where she said, "I
      have a bad --"
 3
               At the top of page 4. I think you were going to
 4
 5
      say, I have a bad memory.
 6
               THE WITNESS: I don't have bad memory.
 7
               HEARING OFFICER SCULLY: No? What were you going
8
      to say then?
                     "A long time ago, sir. I have bad --"
10
               What were you going to say there?
               THE WITNESS: I don't remember what I was going
11
12
      to say, sir.
1.3
               HEARING OFFICER SCULLY: Okay.
14
      BY MS. ROAM:
15
                               , are you friends with
           Q
16
      Caren Mandoyan?
17
               Currently?
18
               Yes.
           0
19
           Α
               No.
2.0
           Q
               Were you ever friends with him?
21
           Α
               At one point we were.
22
               And when was that?
           0
23
           Α
               Is there part of my testimony that I can refer?
24
           Q
               I'm asking --
2.5
               MR. GOLDFEDER: Objection. She's not allowed to
```

1	ask questions, so she needs to just answer the question.
2	HEARING OFFICER SCULLY: Just answer the
3	question, please.
4	THE WITNESS: I don't remember.
5	BY MS. ROAM:
6	Q Okay. When was it in relationship to your
7	friendship with ?
8	A When she was in the process of ending.
9	Q Okay. Can you tell us how you became friends
10	with Caren Mandoyan?
11	A He sent me a Facebook message.
12	Q I'm sorry, you said he sent you a Facebook
13	message?
14	A Correct.
15	Q What did he say in that Facebook message?
16	A Nothing specific, just general, Hi. How are you?
17	You should come to ride along with me.
18	That's all I can remember.
19	Q Okay. But prior to that you were not friends
20	with him?
21	A We knew each other, but we weren't friends.
22	Q Okay. Had you worked together?
23	A No.
24	Q Okay. And after he sent the Facebook message,
25	explain your relationship.

1	А	We exchanged numbers and we started talking.
2	Nothing -	just friends.
3	Q	Okay.
4	А	Purely friendship.
5	Q	Okay. Now, are you Armenian?
6	А	I am.
7	Q	And did Caren Mandoyan ever refer to that?
8	А	Yes, ma'am. He said that we both are Armenians
9	and we sh	nould take care of each other.
10	Q	Okay. And that was in the when he was trying
11	to befrie	end you?
12	А	Correct.
13	Q	Okay. So once you were friends, you began
14	talking;	is that correct?
15		Is that what you just testified to?
16	А	Correct.
17	Q	And how often would you and Caren talk?
18	А	At one point it was quite often.
19	Q	And were you calling him or was he calling you?
20	А	Both.
21	Q	Okay. Was all right.
22		When you were friends with Caren, did he ever
23	indicate	that he wanted to break up with
24	А	Initially he never mentioned anything about that.
25	Q	At any point did he mention anything about

1 breaking up with I don't recall. 2 Okay. Now, are you aware of 3 at some point changing her phone number? 4 5 Yes, ma'am. And when was that in relationship to what was 6 7 going on with her and Caren Mandoyan? I think it was -- I remember one incident when 8 Α 9 Deputy Mandoyan showed up and we were having dinner. and two other partners of ours were having 10 myself, 11 dinner. He showed up and surprised her and she get really 12 upset and she said that she was going to change her number, and she did. 1.3 14 And do you recall time wise when that was? 15 No, ma'am. Α 16 Now, when you and Caren were talking, did you 17 ever complain that he was blowing up your phone? 18 Who was? Α 19 Did you ever complain that Caren was blowing up 20 your phone? 21 I'm not understanding the question. Α 22 Okay --0 23 Α Mandoyan blowing up my phone? 24 0 Yes. 2.5 No, ma'am. Α

1	Q Okay. You never complained that he was calling
2	you all the time?
3	A He was calling me quite often but not blowing up
4	my phone.
5	Q So you never complained to anyone that he was
6	calling you incessantly?
7	A No. Not that I remember.
8	Q Now, outside of talking on the phone, did you
9	have any other relationship with Caren Mandoyan?
10	A We just met up one time at Starbucks.
11	Q So your relationship mostly was this phone
12	relationship, talking on the phone; is that correct?
13	A Correct.
14	Q And when you were talking with Caren Mandoyan,
15	did he ever ask you questions about ?
16	A Yes, ma'am.
17	Q Okay. How could you explain? Did he ask you
18	a lot of questions?
19	A Just curiosity questions.
20	Q Now, when you were interviewed by
21	, were you truthful?
22	A Yes, ma'am.
23	Q Did you feel that while Deputy Mandoyan was
24	calling you that he was manipulating you in any way?
25	A Yes, ma'am. I found out that after the fact when

1 he told me that was saying that I don't --2 that I don't deserve to be a deputy because I can't -- I have an accent and I can't even speak English. I have 3 a -- and I confronted and she told me that's 4 just a way of manipulating me. 5 6 HEARING OFFICER SCULLY: Can I have that question 7 read back please, and the answer? 8 (The record was read by the court reporter.) 9 HEARING OFFICER SCULLY: Hang on. I'm going 10 to -- I want to -- the witness -- objection -- I want to 11 sustain that question as argumentative and strike the 12 answer. 1.3 I want you to just ask her facts -- and because 14 it's argumentative for her to say it's manipulative, 15 trying to say what is going on in his head. You could just elicit the facts, and if it's manipulative, you can 16 17 point out how and why it's manipulative, but her opinion 18 of it is too much of her opinion and not enough fact, and 19 I think it's an argumentative and improper conclusion. 2.0 I'm going to sustain my objection to that question and 21 strike the answer. 22 So you can go ahead. 2.3 BY MS. ROAM: 24 Okay. Did Caren Mandoyan ever ask you for 2.5 's phone number after she changed her number?

He did. 1 Α 2 And did you give it to him? No, ma'am. 3 Α Why not? 4 0 5 I just didn't want to be part of that problem 6 because I knew what was going on between them two. 7 Okay. Now, do you recall an incident about a donut box? 8 Yes, ma'am. Α Can you tell us about that? 10 11 Sure. I saw a donut box and Α wrote 12 something on the donut box. I took a picture and sent it 1.3 to Caren Mandoyan. 14 Okay. Did you ever just volunteer information to 15 Caren Mandoyan about We were just friends. He was very, very, 16 17 extremely helpful to me, Deputy Mandoyan. He was helping 18 me out, whatever I needed as a deputy. He had more 19 knowledge and experience, and I will never forget that, 2.0 and I will mention that he did help me when I needed help. 21 ever ask you if you were sharing Okay. Did information about her with him? 22 23 She never asked me. 24 Did she ever tell you she felt the Appellant was 2.5 stalking her?

1 MR. GOLDFEDER: Objection. Lacks foundation. 2 HEARING OFFICER SCULLY: Sustained. MS. ROAM: It was foundational. I was going to 3 ask her what told her. 4 5 HEARING OFFICER SCULLY: Well, do you have a time and a place and, you know, circumstances? Can you -- to 6 7 establish they were having a conversation, and then ask 8 her what was in the conversation, or is this just anytime at all from 2014 onward? BY MS. ROAM: 10 11 During the four months that you were friends, 12 from December of 2014 to March of 2015, did 1.3 ever tell you that the Appellant -- she felt the Appellant 14 was stalking her? 15 MR. GOLDFEDER: Again, lacks foundation and calls 16 for speculation on the part of someone making an allegation that has no basis of fact. 17 HEARING OFFICER SCULLY: Well, I'll allow the 18 19 question, but I'd like you to -- overruled. Let her -- go 2.0 ahead. 21 THE WITNESS: Yes, ma'am. She said that she was 22 at the car wash one time and she saw Deputy Mandoyan. 23 BY MS. ROAM: 24 Okay. Did she say anything else? I'm sorry. Not car wash, gas station. 2.5

1	Q Okay. Were there any other instances?
2	HEARING OFFICER SCULLY: Wait. Did she say
3	anything else about that?
4	THE WITNESS: No. She just she said that she
5	was very fearful because she saw Deputy Mandoyan at the
6	same gas station by her house.
7	BY MS. ROAM:
8	Q Okay. Did she say why that made her fearful?
9	MR. GOLDFEDER: Objection. Calls for hearsay,
10	calls for speculation, and calling for a conclusion.
11	HEARING OFFICER SCULLY: Overruled.
12	THE WITNESS: I don't remember, unfortunately.
13	BY MS. ROAM:
14	Q Okay. Other than her seeing Mandoyan by the gas
15	station by her house, did she share any other instances
16	with you?
17	A Not that I remember, ma'am.
18	Q Okay. Do you know ?
19	A Yes, ma'am.
20	Q How do you know
21	A She I used to work with her as well in
22	Twin Towers when I was a custody assistant.
23	Q Okay. And were you friends with
24	A No, ma'am. We were colleagues.
25	Q At some point did reach out to you about

1	
2	A Not about but she reached out to me on
3	Instagram and she asked me if I ever told the guy that
4	she's dating that she's a whore.
5	Q Okay. Did you talk to
6	A I never spoke to her, and I actually she
7	called me to clarify what was going on.
8	Q Did you communicate with
9	A Yes, ma'am. She called me and we had
10	conversation and she told me she was currently dating
11	Deputy Mandoyan and he spent a night with her last night
12	and he told her that I told Deputy Mandoyan that she's a
13	whore.
14	Q Had you told Deputy Mandoyan that?
15	A We never had conversation about
16	Q And did you do you know if and
17	spoke after you had your contact with
18	MR. GOLDFEDER: Objection. Calls for hearsay and
19	lacks foundation.
20	HEARING OFFICER SCULLY: Sustained.
21	BY MS. ROAM:
22	Q Did you suggest that contact
23	A Yes, ma'am.
24	Q Why?
25	A Because I wanted them to talk to each other

1 because I told her that he's dating 2 Okay. When was this in relation to and Caren Mandoyan dating? 3 I don't remember the time frame. 4 tell you anything that made 5 Okay. Did you concerned for 6 7 MR. GOLDFEDER: Objection. Hearsay. 8 HEARING OFFICER SCULLY: It's also irrelevant, so 9 sustained. 10 MS. ROAM: Okay. 11 HEARING OFFICER SCULLY: It's irrelevant because 12 this isn't -- her concern is not really relevant here. BY MS. ROAM: 1.3 14 Why did you end your friendship with 15 Caren Mandoyan? showed me a picture of me -- he 16 Because was working overtime at West Hollywood Station, it was a 17 18 Halloween parade --19 THE REPORTER: Slow down, please. 2.0 THE WITNESS: I was working a Halloween parade 21 overtime. Deputy Mandoyan was also hired to work the same 22 overtime. I texted him and I had said, If you like, we 23 can go -- this was in the beginning of the process and I 24 had no idea what was going on. I found out after the fact 2.5 when I initiated conversation with She showed me

a picture that -- a long time ago he took a picture of me 1 2 while eating and sent it to and said, Look at this ugly bitch, or something to those lines, I'm not exactly 3 sure, and that's what ended the relationship with Mandoyan 4 5 and myself. BY MS. ROAM: 6 7 Okay. Why did you end your relationship with 8 Α Because --10 MR. GOLDFEDER: Objection. Relevance. 11 HEARING OFFICER SCULLY: Overruled. 12 THE WITNESS: Because Mandoyan was calling -- I 13 was showing something to on my cell phone, 14 and then he -- she accidentally saw Caren Mandoyan's phone 15 number and name on my phone and she said, Have you been 16 communicating, talking to him, and I said yes, and then 17 she got upset and that's what ended the relationship. 18 BY MS. ROAM: 19 Was that after she had changed her phone number? Q 2.0 Α No. She still had her old phone number. 21 MS. ROAM: I have no further questions. 22 HEARING OFFICER SCULLY: Okay. Cross-exam. 23 MR. GOLDFEDER: Thank you, your Honor. /// 24 /// 2.5

1 CROSS-EXAMINATION 2 BY MR. GOLDFEDER: Was Caren Mandoyan calling you mostly or were you 3 calling Caren? 4 5 Α Both. 6 Okay. Did you ever have e-mail contact with 7 Deputy Mandoyan? 8 Α Yes. Okay. What was the basis of that? Q 10 He was helping me with work. Α How was he helping you with work via e-mail? 11 12 I would ask him, This is what I have and how Α 1.3 could you help me to word this correctly? 14 Since he had more experience as a deputy sheriff 15 and was way more knowledgeable than I was, he was helping 16 It was only work related. 17 Was he working at West Hollywood Station at the 18 time you were reaching out to him on e-mails to help you 19 with deputy sheriff duties? 2.0 At the time he wasn't, but he did work 21 West Hollywood at one point. 22 I understand that, but at the time you were 23 reaching out to him on e-mail, was he working at the 24 West Hollywood Station?

He was at South LA Station.

2.5

Okay. And what would Deputy Mandoyan be doing in 1 2 regard to helping you with these e-mails? He was helping me with report writing. 3 Did he write your reports for you? 5 He helped me with-- he would -- he would send me 6 an e-mail and I would refer to his report. 7 Would he actually draft your reports for you and 8 send that to you by e-mail? He would help me with report writing. 10 HEARING OFFICER SCULLY: He's asking a very 11 specific question. I think he wants an answer to that 12 question. Can you answer that question that was asked to 1.3 you, which was: 14 "Did he actually draft reports 15 and submit them to you?" 16 THE WITNESS: Yes. 17 BY MR. GOLDFEDER: 18 Okay. Would you say he drafted probably over 22 reports for you? Does that number sound about accurate? 19 2.0 Α I don't remember. 21 Would it help refresh your recollection if you 22 reviewed some of these e-mails? 23 I already mentioned he did help me. I'm not 24 denying the fact that he was helping. He did help a lot. 2.5 Well, I'm trying to ascertain the number and the

1	amount as far as volume.
2	Would it help refresh your recollection if you
3	looked at some e-mails?
4	A Sure.
5	MR. GOLDFEDER: I'm not sure what exhibit we're
6	up to at this point, your Honor, for the defense. I want
7	to say
8	HEARING OFFICER SCULLY: For the Appellant?
9	MR. GOLDFEDER: For Appellant. The last exhibit
10	was marked as 52, if I'm not mistaken.
11	HEARING OFFICER SCULLY: I believe that's
12	correct, and so the Appellant has a total of 50. I
13	believe that's what we did
14	MR. GOLDFEDER: Yes.
15	HEARING OFFICER SCULLY: 50 52 is what I have.
16	MR. GOLDFEDER: I'd like to mark as an exhibit
17	here Exhibit 53, next in order, and I have copies for
18	everyone.
19	(Appellant's Exhibit 53 was marked for
20	identification by the Hearing Officer.)
21	HEARING OFFICER SCULLY: Thank you.
22	MS. ROAM: Thank you.
23	BY MR. GOLDFEDER:
24	Q I want to show you an exhibit that's been
25	pre-marked as Exhibit 53, Appellant's Exhibit 53 next in

order, and it's internally paginated of 22 pages. 1 2 Why don't you take a look at those, , and tell me if you recognize what they 3 are. 4 5 Do you want me to count them? 6 I want you to look at the 22 pages and tell 7 me if you've had a chance to refresh your recollection so 8 I can ask you some questions about those. It is 22 pages; however, there are some reports 10 that are repetitive. Page 2 and page 3 are repetitive. 11 It's the exact same thing. 12 Q Okay. 1.3 Α Page 4 and page 5, repetitive, exact same thing. 14 He did help me a lot. 15 Let me ask you: Your e-mail address, , is that your address? 16 17 Α Yes, sir. 18 Okay. And you were reaching out to 19 Deputy Mandoyan to write your reports for you; is that what the e-mails were for? 2.0 21 Α No. 22 Well, the reports -- let's look at page 1. 23 Did you draft this? 24 Α That's an e-mail from him, sir. 2.5 So you didn't draft this? Q

A No.
Q This was something that was sent to you by
Deputy Mandoyan?
A .
Q Did he draft this and send this to you?
A Yes.
Q Was this at your request?
A He offered help and I accepted help.
MR. GOLDFEDER: Well, motion to strike as
nonresponsive. Probably a poorly-phrased question. Let
me try again.
BY MR. GOLDFEDER:
Q Did you specifically reach out to Caren Mandoyan,
let's say on March 29th, 2015, to have him draft a report
for you?
A I don't remember.
Q Well, did you have a situation here with, looks
like Deputy Holloway and , regarding a use of
force, Unit 95J, apparently somebody for public
intoxication?
Is that a call that you were dispatched as your
duties as a West Hollywood Deputy Sheriff or working
Universal Studios?
A Yes, sir.
Q And did you contact Deputy Mandoyan and provide

him facts about this particular incident that was assigned 1 2 to you as a deputy sheriff out at West Hollywood Station? He was assisting me with report writing, yes, 3 sir. 4 5 It's not as if Caren Mandoyan just sent you 6 information about your call, he never received this call. 7 He wasn't working with you that night, was he? 8 Α No. He wasn't, sir. 9 Okay. So at some point did you reach out to 10 Caren Mandoyan to have him draft this report regarding 11 force? 12 Yes, sir. Α 13 Okay. And would you say when you reached out to 14 Deputy Mandoyan and asked him to do this, were you two friends? 15 16 Α Yes, sir. 17 Okay. And did you reach out with the idea that you were manipulating Deputy Mandoyan into doing your 18 work? 19 2.0 No, sir. I sincerely cared about him. 21 Q Okay. 22 And I even told him that he's like a brother to 23 me. 24 And as a brother, Deputy Mandoyan helped you 2.5 write a report and do your job; correct?

He didn't do my job. He helped me with report 1 2 writing because I was new to the Department. Well, isn't report writing part of your training 3 as a deputy sheriff? 4 5 Yes, it is. MS. ROAM: I would object. This is 6 7 argumentative. We've established that they were friends, 8 that he helped her with report writing. HEARING OFFICER SCULLY: Well, I don't think it's argumentative. I think it's just part of 10 11 cross-examination. I think it's -- so, overruled. 12 BY MR. GOLDFEDER: 13 You went through the Sheriff's Academy? 14 I did, sir. Α 15 Do you have a post course for report writing in 16 the Sheriff's Academy? 17 Α I do. 18 Can you please wait for him to THE REPORTER: 19 finish the question? BY MR. GOLDFEDER: 2.0 21 And did you get any further courses on report 22 writing as a deputy sheriff, let's say, before you went to 23 patrol? 24 Α Yes, sir. 2.5 Okay. And did you get the report writing classes

at the patrol school? 1 Yes, sir. 2 Α 3 And were you on training at West Hollywood Station as a patrol deputy? 4 5 Α Yes, sir. 6 Was that a six-month training program? 0 7 Yes, sir. Α 8 And were you handling reports as part of your 0 9 training duties at West Hollywood when you were at patrol training? 10 11 Α Yes, sir. 12 And at some point did you get through all phases of patrol training and get off training? 13 14 Yes, sir. Α 15 How many phases are there of patrol training, by the way, to complete? 16 17 Α Six. 18 Were you ever on remediation for report writing 19 during that time? 2.0 Α No, sir. 21 So when you got off training, were you in a --22 what you refer to as a king car, working by yourself? 23 Α Yes, sir. 24 When you were working the king car by yourself, 2.5 you have to handle all the paperwork as part of your job

duties; correct? 1 2 Yes, sir. That includes writing reports that are dispatched 3 0 to you or work that you generate arresting people; things 4 of that nature? 5 6 Α Yes, sir. 7 And when you started to reach out to contact 0 8 Deputy Mandoyan to have him write reports, what was the purpose of that? 10 I did not reach out to him to have him write my 11 reports. I can write my own reports, and I've been 12 writing them all these years. He just assisted me with 13 report writing. 14 Page 1 of Exhibit 53, is that your language or 15 Deputy Mandoyan's language? 16 Deputy Mandoyan's language. 17 And did you incorporate this into the report on 18 March 29th, 2015, from the incident that you were 19 dispatched to? 2.0 I don't remember. 21 Do you remember receiving this? 0 22 I do remember receiving this, yes. Α 23 Let's turn to page 2. Looks like it's also 24 March 29, 2015, actually looks like 6:03 p.m. First page 2.5 on Exhibit 1 was March 29th, 2015, at 4:24 a.m. in the

1	morning.
2	On page 2, is this an e-mail that you sent to
3	Deputy Mandoyan in response to some call at
4	in West Hollywood?
5	A Yes, sir.
6	Q Okay. And what was your purpose in contacting
7	Deputy Mandoyan in regard to this call at
8	that you received on
9	March 29th, 2015?
10	A So he can proofread my report.
11	Q Okay. Is that something Deputy Mandoyan gets
12	paid to do, is proofread your reports?
13	A He offered to help. He was a training officer
14	and he was really good at report writing.
15	Q But he's not working at West Hollywood back on
16	March 29th, 2015, was he?
17	A He was my friend.
18	HEARING OFFICER SCULLY: You're getting
19	, you're getting to where you're arguing
20	with him and kind of defending yourself. He asked you a
21	simple question and you need to focus on his question and
22	answer that question; okay?
23	THE WITNESS: Yes, sir.
24	HEARING OFFICER SCULLY: Sergeant Roam can ask
25	you other guestions if you think that there needs to be

clarification after cross-exam, but I just want you to 1 2 answer his questions as he asks them to you, if you would, 3 please. 4 THE WITNESS: Yes, sir. BY MR. GOLDFEDER: 5 6 So you're reaching out to Deputy Mandoyan to 7 write your reports on calls that you're dispatched to? 8 Α No. 9 So Deputy Mandoyan just wrote a report with no information and sent you an e-mail? 10 11 He assisted me with report writing, sir. 12 Well, in assisting you with report writing, did 13 you have to contact Deputy Mandoyan and provide him some 14 facts as to what would go into the report that's going to 15 be generated? I would send him my report, he would proofread 16 17 it, send it back to me. So he wasn't drafting your entire reports for 18 19 you; is what you're telling us now? 2.0 Α There was some reports that he drafted, structured for me, so I could have an outline. 21 22 So when you were off training, you were not 23 capable of writing reports on your own? 24 Α I am capable of writing my own reports. 2.5 But you were reaching out to Deputy Mandoyan to

have him assist you with your reports? 1 2 MS. ROAM: I'm going to object. It's been asked and answered. 3 HEARING OFFICER SCULLY: I think we covered this. 4 5 I think the testimony is clear. She -- we can move on 6 past this unless you have anything else that hasn't been 7 covered. BY MR. GOLDFEDER: 8 Why would you reach out to Deputy Mandoyan as 10 opposed to someone at the West Hollywood Station to assist 11 you with your report writing? 12 He offered his help. He said he's a training officer, he's really good at report writing. He used to 13 14 's reports and help her out and he write all 15 said he was willing to help me out. He said when he was 16 new he had to do all this to learn and be better. 17 more you write it the better you become. 18 And you needed assistance in report writing from 19 Deputy Mandoyan? 2.0 Α No, sir. 21 Then what was the purpose in contacting him to 0 22 help you with reports? 23 He was assisting me with proofreading it and 24 helping me with report writing.

Were you having reports rejected at

2.5

West Hollywood Station that you were turning in at the 1 2 time you were reaching out to Deputy Mandoyan? I don't recall. 3 Are you familiar with having reports rejected by 4 5 watch sergeants over at West Hollywood Station at the time 6 you were working there as a field deputy? 7 Rejecting of what sense? Α 8 Well, you turn a report in and it's not approved, 9 it's rejected. Did that happen to you often when you were on 10 11 training? 12 Not often. Α 13 Q But it did happen to you? 14 I don't remember. Maybe. Α 15 Well, did it happen or not? 0 16 I don't remember if that period anything 17 happened. 18 Well, did you ever reach out to Deputy Mandoyan 19 to ask for his assistance in, let's say, driving tactics 2.0 when you were working patrol at West Hollywood Station? 21 Α No. 22 So, specifically, anytime you reached out to him 23 in an e-mail was to have him help you proofread, draft, 24 whatever various reports of incidents that you had? 2.5 Α Fair to say that.

1	Q Okay. But you said when you got off training you
2	were passed successfully for report writing; correct?
3	A Correct, but I wanted to be better.
4	Q So you reached out to Deputy Mandoyan to have him
5	write better reports with your name attached to them?
6	A No. He never wrote my reports. I write my
7	reports, he assisted me.
8	Q Did you ever put his name on the report at the
9	bottom when it was turned in to the watch sergeant?
10	A What do you mean, sir? I'm not understanding the
11	question.
12	Q Well, you write a report, you put your name at
13	the bottom of it; correct?
14	A Yes, sir.
15	Q Okay. When you were on training, you would put
16	your name on the report as well as the training officer
17	that was in the car with you; correct?
18	A Yes, sir.
19	Q Okay. And Deputy Mandoyan is helping you in some
20	capacity with your report writing that you would turn in
21	during this time frame in 2015; isn't that correct?
22	A That's correct.
23	Q Did you ever put his name on the report so he
24	could be, you know, part of the sequence if any issues
25	came up with that report?

1	A No.
2	Q Did you ever indicate to him whether you put his
3	name on the reports or not?
4	A It's common practice when they're training
5	officers they help everybody, whoever needs help, to
6	better their writing skills or anything else that they
7	need help with.
8	Q And during this time frame, Deputy Mandoyan was a
9	training officer over at South Station?
10	A That's what he told me.
11	Q Do you have any personal knowledge that that's
12	where he was working at that time?
13	A I did not have knowledge. That's what he told
14	me.
15	Q Did you ever ask any training officer at
16	West Hollywood Station to help you with your reports
17	during this time that you were reaching out to
18	Deputy Mandoyan?
19	A Sure.
20	Q Did you put their names on the report?
21	A You don't have to put their names if they're just
22	proofreading to help you out to have a better quality
23	report.
24	Q Well, I'm looking at reports here that are
25	actually listing all the information. Here you're saying

1	he just proofread your reports and you mailed them to him?
2	A Some of them.
3	Q But not all of them?
4	MS. ROAM: I'm just going to object. This has
5	been asked and answered.
6	HEARING OFFICER SCULLY: Sustained.
7	BY MR. GOLDFEDER:
8	Q So you said earlier in your testimony that
9	Deputy Mandoyan was contacting you by phone only.
10	That wasn't actually correct; was it?
11	A In regards to 's case, that was the
12	case. I was truthful.
13	Q When were you first contacted about this case?
14	HEARING OFFICER SCULLY: Can you clarify what
15	"this case" means?
16	MR. GOLDFEDER: Certainly.
17	BY MR. GOLDFEDER:
18	Q When were you first contacted by anyone from the
19	Department about your testimony in this Civil Service
20	hearing?
21	A What do you mean, sir?
22	Q How did you find out about having to come here at
23	Civil Service?
24	A I was contacted by
25	Q Okay. Did you ever have a meeting with

1	?
2	A Yes, sir.
3	Q When did that take place?
4	A The official formal interview at
5	Universal Studios.
6	Q Okay. After your interview was taken by him when
7	he was working at Internal Affairs, did you ever meet with
8	him prior to coming to Civil Service in regard to your
9	testimony that was going to be presented here?
10	A No, sir.
11	Q Okay. How about Sergeant Roam? Did you ever
12	have communications with her in advance of your testimony
13	here today?
14	A She handed to me my subpoena.
15	Q Did she ever have a meeting with you?
16	A What kind of meeting, sir?
17	Q A meeting where the two of you were talking about
18	your testimony in this case?
19	A Yes, sir.
20	Q Okay. How long was that meeting?
21	A I don't remember.
22	Q Was it a couple hours? Can you give us your best
23	estimate?
24	A Ten, fifteen minutes.
25	Q Okay. And your relationship with

-- how do you know 1 2 We used to work Twin Towers together. Α At some point were there some text messages that 3 0 came to your attention that were directed toward 4 5 Α What -- from 6 7 0 Yes. I don't remember. 8 Α 9 Can you turn to page 7 in the binder in front of Q you, which is your testimony, which is 10 11 Department's Exhibit, I believe, 8. 12 Α Did you say page 8, sir? I said Exhibit 8 in the Department's binder. 13 Q No. 14 And if you could turn to page 7, if you could read from 15 just above the middle clip, where it says " and 16 "who was that." 17 If you could just read that to yourself through the bottom of page 7 and the top few lines onto page 8. 18 19 Let me know when you've had a chance to do that. 2.0 Α Oh, yes. "Per Mandoyan's request --" 21 I don't want you to read it, just read it to 22 yourself, and I want to ask you some questions about it. 23 Α Oh. 24 And I apologize, , I want you to start from the top of page 7. It will probably just make 2.5

1 it more complete. 2 Α Okay. And on page 7 -- well, when you were being 3 interviewed by , did you understand all 4 5 his questions? 6 Α Yes, sir. 7 And you understand you had an obligation to be 0 truthful with him? 8 Α Yes, sir. Okay. So when you told 10 that 11 you received a text message saying, You big tomato nose, 12 stay out of my business, can you tell us about that text message and who it was from? 13 14 Yes, sir. I got an anonymous text message 15 saying, You big tomato nose, stay out of my business. I replied back to that number, Who is this, but no reply. 16 17 A few minutes after I get a text message from saying that's her texting me and that I need to stop 18 19 texting her, so I told her to give me a call back. So she 2.0 called me right away, we had conversation, and she asked 21 me if I was the person sending her those anonymous text 22 messages and I told her no. 23 Later on I found out -came to me 24 and apologized to me and said she found out who those text 2.5 messages came from. She spoke with and

```
1
                    told
                                      that she was the person
2
      sending those messages per Deputy Mandoyan's request.
               HEARING OFFICER SCULLY: Okay. Can I just
 3
      clarify?
 4
 5
               MR. GOLDFEDER:
                               Sure.
               HEARING OFFICER SCULLY: So you get a text
 6
 7
      message -- an anonymous text message calling you a big
 8
      tomato nose?
9
               THE WITNESS: Yes, sir.
10
               HEARING OFFICER SCULLY: You text back saying,
11
      Who is this, and then you get a text from
12
      saying, It was me. I was mad because somebody was
13
      anonymously texting me and I thought it was you.
14
               THE WITNESS: Correct.
15
               HEARING OFFICER SCULLY: And then the two of you
16
      somehow found out, no, it was actually
                                                            that
17
      was anonymously texting
                                              Is that --
18
               THE WITNESS: That's correct, sir.
19
               HEARING OFFICER SCULLY: Okay.
2.0
      BY MR. GOLDFEDER:
21
               Okay. So
                                        was sending these
22
      anonymous text messages to
23
               That's how you found out it was
24
      correct?
2.5
               I found out from
                                             , because
```

1	told	it was her sending it.
2	Q	Okay. So was sending these various
3	text mes	sages apparently to , these anonymous
4	text mes	sages.
5		And did you ever receive any anonymous text
6	messages	from ?
7	А	No.
8	Q	And you worked with at Twin Towers.
9		Were you friends at the time or just co-workers?
10	А	Co-workers.
11	Q	And were you aware that at the time
12	was send	ing these text messages she was in a relationship
13	with Dep	uty Mandoyan?
14	А	I did not know anything at that time.
15	Q	At some point in time did you become aware of
16	that bit	of information?
17	А	Yes. When she reached out to me on Instagram.
18	Q	reached out to you on Instagram?
19	А	Correct.
20	Q	And she indicated to you she was in a
21	relation	ship with Deputy Mandoyan prior to sending these
22	anonymou	s text messages to ?
23	А	I found out that from , not from
24		•
25	Q	Okay. And you never gave

1	(There was an interruption in the proceedings.)
2	BY MR. GOLDFEDER:
3	Q Do you remember approximately when
4	indicated to you she changed her phone number?
5	A She mentioned to me, yes, sir.
6	Q Okay. Caren you never gave her phone number
7	to Deputy Mandoyan, did you?
8	A No.
9	Q Did apologize to you when she found
10	out that Deputy Mandoyan wasn't sending her these text
11	messages, that it was
12	MS. ROAM: That's been asked and answered.
13	HEARING OFFICER SCULLY: Well, I don't recall
14	that so I have to you may be right, but overruled.
15	THE WITNESS: Can you repeat the question?
16	BY MR. GOLDFEDER:
17	Q Yeah. Did apologize to you that
18	she was blaming Deputy Mandoyan for the text messages that
19	she was receiving from ?
20	A No. She apologized to me for thinking that it
21	was me sending her those messages.
22	Q Okay. But she confirmed, and now you understand
23	it was sending those text messages, not
24	Deputy Mandoyan; correct?
25	MS. ROAM: And I'm just going to object. I think

that calls for hearsay and speculation. 1 2 HEARING OFFICER SCULLY: Well, I mean, that seems is testifying, is a lot 3 to be a lot of why of what she's testified to is hearsay, so -- and a lot of 4 5 it is not something she personally saw. So I'll overrule 6 the objection and let her answer. 7 Can you remember the question? 8 THE WITNESS: No, sir. 9 HEARING OFFICER SCULLY: I can ask the court 10 reporter to please read it back? 11 (The record was read by the court reporter.) 12 THE WITNESS: I just heard her apologizing for 13 blaming me for sending those messages. 14 BY MR. GOLDFEDER: 15 And you know it was that was sending the messages? 16 That's what I was told. 17 Α Okay. And did Deputy Mandoyan ever talk to you 18 19 about these anonymous text messages? Not that I remember. 2.0 21 Okay. Could you turn to page 8 of your testimony 22 in Department's Exhibit 8. If you could look at the 23 middle of page 8, where it starts off " 24 Deputy Mandoyan." 2.5 Yes, sir.

1	Q So when you were answering questions in response
2	to your interview with then-
3	asked you if, you know:
4	"Did Deputy Mandoyan ever talk to
5	you about those anonymous text messages?"
6	Your response was:
7	"He never bought it up."
8	So your testimony was true and correct when you
9	were being interviewed by Internal Affairs?
10	A He never brought it up.
11	Q Okay. And you asked at some point when you
12	were still talking with Deputy Mandoyan, you asked him
13	about text messages; isn't that correct?
14	A That is correct.
15	Q And he indicated to you that he did not send any
16	text messages; isn't that correct?
17	A Correct.
18	Q So was Deputy Mandoyan being a good partner and
19	friend to you during the time you two were communicating?
20	A I don't remember.
21	Q Why don't you read the paragraph at the bottom of
22	page 8 in Department's Exhibit 8, and see if that
23	refreshes your recollection.
24	A Can you repeat the question, sir?
25	Q Well, I just had you read the last entry. So

this would be my first question: When you were being 1 2 interviewed by , you indicated that, 3 quote: "I think his motive was to find out information about not necessarily 5 be a good partner or friend to me. 6 7 how I took it." 8 So was that statement true when you were 9 interviewed by I felt that way after the fact, after finding out 10 11 the truth about everything. 12 Okay. So he wasn't being a good friend or partner when he was assisting you with report writing? 1.3 14 At the time he was very helpful, very good friend 15 of mine. 16 So when you told 17 "He's not necessarily a good partner or friend to me," was that a false statement to 18 19 2.0 Α That is a true statement, and I felt that way after finding out the truth, but at the time when he was 21 22 helping me and I was helping him, we were good friends 23 with each other. 24 Well, the truth was was sending 2.5 these various text messages to

1	That's what you testified to; correct?
2	A That's what told me.
3	Q Okay. But you also confirmed with
4	that she was sending you text messages also; isn't that
5	true?
6	A That is true.
7	Q Okay. Were you ever present with
8	and Deputy Mandoyan when they were out on a date?
9	A I don't remember. You mean outside work, sir?
10	Q Correct.
11	A No.
12	Q Did you ever get copies of text messages that
13	was sending to ?
14	A No.
15	Q Did ever tell you what was in those
16	various text messages that was sending her?
17	A Something to the line of stop sleeping with men,
18	or something like that.
19	Q When was the last time you reached out to
20	Deputy Mandoyan to assist you with a report?
21	A Long time ago. Three years ago, two years ago.
22	Q So anything about Deputy Mandoyan's relationship
23	with that you know about is based upon what
24	is telling you; is that a fair
25	characterization?

1	
1	A About their relationship, yes.
2	Q Okay. And you never went out to dinner with
3	Deputy Mandoyan and when they were dating?
4	A Not that I remember.
5	Q Were you ever invited to any dinner parties over
6	at either of their residences?
7	A No, sir.
8	Q At some point while you were at the
9	West Hollywood Station and reached out to
10	you, you indicated in your interview that she was asking
11	you questions.
12	When she reached out to you, do you remember what
13	those questions were that she was asking you?
14	A If I told Caren Mandoyan that she's a whore.
15	Q And did she tell you that her and Caren were
16	dating at that time and in a committed relationship?
17	A Yes, sir.
18	Q And you indicated to that you
19	had received these various text messages from that
20	sent to , but you were not able
21	to send him any copies of those; is that correct?
22	A If that's what I said on my statement, yes, sir.
23	I don't remember it now.
24	Q Did you take screenshots of those text messages
25	that sent to that were

1	forwarded to you?
2	A I don't remember.
3	Q But you indicated you took screenshots of them in
4	your testimony to then-
5	A At the time maybe I did. I don't remember, sir.
6	Q Did you ever do you still have the same phone
7	you were using back in
8	A No.
9	Q Did you upload any of your photographs or any
10	text messages or anything to a Cloud storage system?
11	A No.
12	Q After Deputy Mandoyan indicated to you that he
13	broke up with , did he ever specifically ask
14	you who she was dating after that time?
15	A Who can you repeat the question?
16	Q Yeah. At some point you found out that
17	Caren Mandoyan and were no longer dating;
18	isn't that true?
19	A They were in the process of breaking up.
20	Q Okay. So at the point in time when they were no
21	longer dating and they broke up, did he ever ask you who
22	was dating after that breakup time?
23	A I don't remember.
24	Q Why don't you turn to page 5 of
25	Department's Exhibit 8, and just read the last four

2 A Page 5, sir?	
Q Page 5. Let me know when you have had	a chance
4 to review those.	
5 A What part do you want me to read, sir?	
Q The bottom five entries, were it starts	s with:
7 "All right."	
8 Have you had a chance to review those?	
9 A Yes, I did, sir.	
Q Okay. So when you were asked by	
11	
12 "Did Mandoyan ever specifically as	sk
who was dating after they broke	up?"
14 Your response was:	
"No. He never asked me that quest	cion."
16 Is that true?	
Is that true? A I just said I don't remember. I never	said he
	said he
17 A I just said I don't remember. I never	
17 A I just said I don't remember. I never 18 never asked me that question.	r, quote:
A I just said I don't remember. I never never asked me that question. Q Well, it says right here in your answer	r, quote:
A I just said I don't remember. I never never asked me that question. Q Well, it says right here in your answer "He no. He never asked me that	r, quote:
A I just said I don't remember. I never never asked me that question. Q Well, it says right here in your answer "He no. He never asked me that question."	r, quote:
A I just said I don't remember. I never never asked me that question. Q Well, it says right here in your answer "He no. He never asked me that question." Are you on page 5?	r, quote:

1	me that question."
2	Are you on page 5?
3	A Oh
4	Q That's page 6.
5	A Yes, sir.
6	Q So does that refresh your recollection that
7	Deputy Mandoyan never asked you who was
8	dating after they broke up?
9	A Yes, sir.
10	MR. GOLDFEDER: Nothing further.
11	HEARING OFFICER SCULLY: Okay. Thank you.
12	Any redirect?
13	MS. ROAM: Just very briefly.
14	HEARING OFFICER SCULLY: Okay.
15	
16	REDIRECT EXAMINATION
17	BY MS. ROAM:
18	Q , I want to turn your attention to
19	the e-mails that Counsel marked as Appellant's Exhibit 57.
20	You had a chance to review these?
21	A Yes, ma'am.
22	Q And it appears the date range is March 29, 2015,
23	through May 31, 2015.
24	Is that roughly the time period that you and
25	Caren Mandoyan were friends?

1 Α Yes, ma'am. 2 Does that refresh your recollection as to when you were friendly with him? 3 Α Absolutely. 4 5 Now, is there anything inappropriate about another deputy helping you with your report writing? 6 7 When you're new, as a new deputy, everyone tries Α 8 to help you out to better your writing, not that you don't 9 know how to write. They try to help you to better 10 yourself, to write better reports and -- because you did 11 not have enough experience, you're just new and fresh for 12 the Department, everyone tries to help you out to better your skills. 1.3 14 So it's a common practice? 15 Yes, ma'am. Α And there's nothing inappropriate or against 16 17 policy doing that? 18 That is correct, ma'am. 19 And when you were working with a training 20 officer, and you place the training officer's name on the 21 report, is that because the training officer is actually 22 present with you at the call and able to testify about the 23 facts in the report? 24 Α Yes, ma'am. 2.5 So if someone is just reading your report, would

they be able to testify in court about what happened? 1 2 No. Even during briefings we always discuss the fact of the calls that we handle. Everyone discussed it 3 4 and we try to help each other out. It's a common 5 practice. 6 Okay. And is a deputy having a report rejected 7 uncommon? 8 Not -- no. Everybody at one point -- even 9 himself, being a good report writer, I'm sure he had 10 rejected reports. 11 MS. ROAM: Thank you. I have no further 12 questions. 1.3 HEARING OFFICER SCULLY: Okay. Just so I can get 14 these dates in my head, you said you were friends with from December of 2014 to March of 2015? 15 16 THE WITNESS: Correct, sir. 17 HEARING OFFICER SCULLY: And then you're friends with Deputy Mandoyan from March of 2015 to May of 2015; 18 19 right? 2.0 THE WITNESS: Correct, sir. 21 HEARING OFFICER SCULLY: So those two periods 22 didn't overlap; right? 23 You're friends with one, and then you ended that 24 friendship and you became friends with the other; is that 2.5 what happened?

1	THE WITNESS: No, sir. It overlapped at one
2	point, but he wasn't helping me with reports in the
3	beginning. He start helping me in March. It overlapped
4	maybe a month and a half, or so.
5	HEARING OFFICER SCULLY: Were you actually
6	friends with both
7	THE WITNESS: Both.
8	HEARING OFFICER SCULLY: and
9	Deputy Mandoyan?
10	THE WITNESS: Yes, sir.
11	HEARING OFFICER SCULLY: Okay. And then, why was
12	it you broke up with again?
13	THE WITNESS: Because she saw his phone number on
14	my phone, that he called me, and I didn't tell her that he
15	was calling me.
16	HEARING OFFICER SCULLY: So she became insanely
17	jealous and broke up her friendship with you; is that what
18	happened?
19	THE WITNESS: No. I wouldn't say insanely
20	jealous.
21	HEARING OFFICER SCULLY: Well, she became angry?
22	THE WITNESS: She didn't become angry, she
23	just she just expected me as a friend to let her know I
24	was in communication with Mandoyan.
25	HEARING OFFICER SCULLY: And she didn't like

1	that?
2	THE WITNESS: She did not like that.
3	HEARING OFFICER SCULLY: But your friendship was
4	strictly professional, wasn't it?
5	THE WITNESS: At the time at the time we were
6	friends.
7	HEARING OFFICER SCULLY: There is nothing
8	romantic between the two of you?
9	THE WITNESS: Oh, no. There has never been
10	anything romantic between me and Deputy Mandoyan.
11	HEARING OFFICER SCULLY: And did you explain that
12	to ?
13	THE WITNESS: I did, and she understood it.
14	HEARING OFFICER SCULLY: But still, she couldn't
15	accept it?
16	THE WITNESS: We were cordial and professional,
17	but
18	HEARING OFFICER SCULLY: But she couldn't accept
19	it. You were friends, and then you told her, Look.
20	There's nothing between us, we're just friends, but she
21	would not accept that, so she said, No. I'm ending the
22	friendship with you?
23	THE WITNESS: She never said, I'm ending
24	friendship with you, but she said then we will remain
25	cordial and professional, but the trust was not there

1	anymore because I didn't disclose that information that I
2	was in communication with Deputy Mandoyan.
3	HEARING OFFICER SCULLY: Okay. All right.
4	Any recross?
5	MR. GOLDFEDER: No, your Honor.
6	HEARING OFFICER SCULLY: Any redirect?
7	MS. ROAM: Yeah. I would like to follow up on
8	one thing.
9	
10	FURTHER REDIRECT EXAMINATION
11	BY MS. ROAM:
12	Q When saw Caren Mandoyan's
13	information on your phone, what was her relationship with
14	him like at that time?
15	A They were in the process of breaking up.
16	Q Okay. Did she express how she felt about him at
17	that time?
18	A She yes. She said that she I was her
19	friend and she felt that I violated her trust by talking
20	to him and not letting her know.
21	Q Why?
22	A Because she gave me a lot of information about
23	their relationship and she felt like it could have been
24	relayed to Deputy Mandoyan.
25	Q Was she jealous?

1	A I don't think jealousy was an issue
2	MR. GOLDFEDER: Objection. Calls for speculation
3	at that point.
4	HEARING OFFICER SCULLY: Sustained.
5	MS. ROAM: Okay. I have no further questions.
6	HEARING OFFICER SCULLY: All right. Thank you,
7	•
8	THE WITNESS: Thank you.
9	HEARING OFFICER SCULLY: All right. It's 10:25.
10	Let's take our morning break
11	MR. GOLDFEDER: Excuse me, Deputy, is that the
12	exhibit?
13	MS. ROAM: Yeah. You can't take that. That's
14	ours.
15	MR. GOLDFEDER: Yeah, just leave it here. That's
16	fine.
17	HEARING OFFICER SCULLY: Thank you for catching
18	that.
19	THE WITNESS: I thought that was my copy. Sorry
20	about that.
21	MR. GOLDFEDER: That's okay.
22	HEARING OFFICER SCULLY: I want to suggest we
23	take our morning break now and come back at ten to 11:00,
24	and we'll see if is here.
25	MS. ROAM: She is here.

1	HEARING OFFICER SCULLY: She probably will be.
2	MS. ROAM: She's been here for a while.
3	HEARING OFFICER SCULLY: Okay. Very good. Thank
4	you.
5	(A recess was taken.)
6	HEARING OFFICER SCULLY: Okay.
7	; right?
8	THE WITNESS: Yes.
9	HEARING OFFICER SCULLY: Were you ready to begin?
10	MS. ROAM: Yes.
11	HEARING OFFICER SCULLY: We're going to go to
12	noon, and then we'll take our afternoon break at noon, so
13	we have a little over an hour.
14	And I think has already testified
15	on direct. We haven't had any cross yet?
16	MR. GOLDFEDER: No, your Honor.
17	HEARING OFFICER SCULLY: So I think we'll have
18	the witness swear in again, and then we'll move to
19	cross-examination.
20	MS. ROAM: May I ask, can I reopen direct very
21	briefly?
22	HEARING OFFICER SCULLY: Well, what's the
23	purpose? I mean, what's the need for that?
24	MS. ROAM: Just to establish that
25	status. She's no longer a Department member.

1	HEARING OFFICER SCULLY: Okay. Well, I think
2	we'll go ahead and just go to cross, but that will, I'm
3	sure, come out. So I should say
4	•
5	, raise your right hand, please.
6	
7	,
8	produced as a witness by and on behalf of the Department
9	and having been first duly sworn by the Hearing Officer,
10	was examined and testified as follows:
11	
12	HEARING OFFICER SCULLY: Okay. Thank you. All
13	right.
14	Cross-examination, please.
15	MR. GOLDFEDER: Thank you, your Honor.
16	
17	<u>CROSS-EXAMINATION</u>
18	BY MR. GOLDFEDER:
19	Q Good morning,
20	A Good morning.
21	Q And could you tell us what your current status is
22	as far as employment?
23	A I resigned.
24	Q Okay. You resigned from the Sheriff's
25	Department?

1	A Correct.
2	Q And are you comfortable telling us the reasons
3	for the resignation?
4	A My reasons are relates to all of this. I
5	didn't want to come in today, I didn't want to continue
6	doing this.
7	Q Okay. And I don't mean to pry and I apologize,
8	I'm just trying to get some basic information.
9	Do you feel comfortable telling us at what point
10	you have resigned?
11	A Like, the date of when?
12	Q Yes.
13	A It was Monday, two days ago.
14	Q So that would be the
15	A 25th.
16	Q Okay. The 25th of July, 2017
17	A No. The 25th of September.
18	Q Oh. I'm sorry. I'm looking at your prior
19	appearance date.
20	And at any point in time were you threatened by
21	the Department? Is that what caused your resignation?
22	A No.
23	Q Okay. And when you first met with Sergeant Roam,
24	you indicated it was a six-hour meeting at some point in
25	time before July 26th, 2017. I want to ask you some

1	questions about that meeting.
2	Do you recall that meeting?
3	A Yes.
4	Q Okay. Where did that meeting take place?
5	A Where?
6	Q Yes.
7	A At her place of business, her office.
8	Q And what was discussed during this six-hour
9	meeting?
10	A This case and its totally.
11	Q Was anyone else present at the meeting?
12	A No.
13	Q And at any time during this meeting, were you
14	ever told to testify a certain way?
15	A No.
16	Q Okay. And during this meeting, at any point in
17	time, did you feel you were not free to leave?
18	A No.
19	Q Okay. And when you came to Civil Service on that
20	first occasion to testify on July 26, 2017, did you drive
21	to the Civil Service building here?
22	A No. I drove to TST.
23	Q Okay. And did you drive over to the
24	Civil Service building by yourself?
25	A No. I rode with my lieutenant.

1	Q Who was that?
2	A .
3	Q And did you and talk about
4	your testimony during that ride over from TST to the
5	Civil Service building here?
6	A No.
7	Q Now, when you first contacted El Segundo Police
8	Department or actually, before I get into that, at some
9	point in time you received some anonymous text messages;
10	is that true?
11	A Yes.
12	Q And at some point was it ascertained by you that
13	these anonymous text messages were coming from an
14	individual known as ?
15	A No. Not to my recollection.
16	Q Did you ever tell that these text
17	messages were being sent to you by ?
18	A No. Not to my recollection.
19	Q At any point in time were you aware that
20	was in a relationship with Deputy Mandoyan?
21	A The only time that I was made aware of it was
22	when I was reached out to by that she was
23	informed by that she was in a relationship with
24	Mandoyan.
25	Q So you never had any direct communication with

1	?
2	A I reached out to after I talked with
3	
4	Q And what was the reason for reaching out to
5	after that conversation with
6	?
7	A informed me that I needed to call
8	to that she had information to give me
9	regarding Mandoyan.
10	Q Okay. And prior to reaching out and contacting
11	after this conversation with were
12	you on speaking terms with at that time?
13	A No.
14	Q Okay. And the two of you had a falling-out at
15	some point?
16	A Yeah. Years ago.
17	Q And prior to that, you say years ago before that,
18	the two of you were friendly and worked at the same
19	facility for the Department?
20	A Yes.
21	Q Where did you work together with her?
22	A Twin Towers.
23	Q And what was the reason the two of you no longer
24	communicated or the friendship ended?
25	A Because she I mean, it's so lengthy.

1 Do you want me to get into it? 2 Well, if you just boil it down as much as you 3 can. She called me one night saying that she wanted to Α 4 get away and leave the state and she sounded like she was 5 having a mental breakdown. I went to her house to try to 6 7 calm her down and get her to come home with me, and during the time that I was with her for the two hours, she 8 9 threatened to call Santa Clarita Sheriff's Station and 10 tell them that I threatened her and I stole from her, and I left her house and said, Good luck to you. I'm not 11 getting in the middle of your psychotic break. So I left. 12 And you had not had any communication with her 1.3 14 from that time until after you had this conversation with 15 , and called up at that time? 16 Α Correct. When you say "psychotic break," I don't believe, 17 you know, you're a clinical psychologist or anything, are 18 19 you? 2.0 Α No. I'm not. 21 So this is just your impression as to her 22 behavior towards you? 23 Α Correct. 24 And you indicated that you wanted to get away from her because you felt what? Were you going to be 2.5

1	concerned for your personal safety when she was going
2	through this psychotic break?
3	A I was more concerned for my employment. I didn't
4	steal from her and I sure as heck didn't threaten her, so
5	I didn't want to get caught up in some complaint that she
6	threatened to file, so I left.
7	Q Okay. And how many years went by before you had
8	this communication with her after the discussion with
9	?
10	A Probably four years. Four or five four years.
11	I don't know to be exact.
12	Q And was the message from to call
13	Deputy or , or what was the actual message
14	that was conveyed through to you?
15	A As far as I can remember it was that I needed to
16	call that I needed to call
17	Q Okay. And was this around the time period where
18	you were receiving some anonymous text messages?
19	A Yes.
20	Q What was the actual content of these text
21	messages I don't want to go through all of them.
22	What's your recollection?
23	A They were just, you know, Why are you still here?
24	You don't work here anymore. Get a life.
25	Just harassing in nature.

When you say "here," "You don't work here," you 1 2 are referring to Universal Studios? 3 Α Correct. 4 Was working at Universal Studios Q at that period of time? 5 6 Α Yes. 7 At some juncture, did you contact the Department 0 8 in regards to these text messages? Α Yes. Tell us how that came about? 10 0 11 How did I contact the department, or --Α 12 Q Yeah. Who you contacted or what's the first 1.3 thing you did? 14 I contacted my lieutenant -- or I had already 15 transferred to TST at the time, so I contacted my previous 16 lieutenant, Lieutenant Wiard, and informed him of the situation. 17 And what happened next? 18 I believe he contacted POE Unit, and at some 19 20 point I was contacted by, I don't know, the POE Unit. 21 POE, that stands for Policy of Equality? 0 22 Α Yes. 23 And what does that unit actually do, if you're 24 aware? 2.5 I'm not aware. Α

1 0 Was that something that Lieutenant did on your 2 behalf? I believe so. 3 Α And that was Lieutenant Wiard, W-i-a-r-d? Correct. Α 5 Did you ask him to contact the POE Unit? 6 0 7 I didn't ask him, I just informed him of the Α 8 situation, and what he had to do as a supervisor is what he did. 10 Did you ever see the report that was made by 11 Lieutenant Wiard over at the POE Unit? 12 Α No. What did you tell Lieutenant Wiard, as far as 1.3 14 information for him when you first spoke to him? 15 I don't remember. It's been years, so something to the effect -- I don't remember. Something to the 16 17 effect that I have been receiving harassing phone calls or 18 text messages. Did you ever tell him anything else in 19 Okay. 2.0 regard to your dating relationship with Deputy Mandoyan? 21 That our dating relationship had ended months 22 prior, if anything at all. 23 Okay. Would it help refresh your recollection if 24 I showed you a document that was drafted based upon your 2.5 information as provided to Lieutenant Wiard?

```
1
           Α
               That would help.
2
               MR. GOLDFEDER: I believe, your Honor, we are up
      to Appellant's Exhibit 54.
3
               HEARING OFFICER SCULLY: I think that's correct.
 4
               (Appellant's Exhibit 54 was marked for
 5
               identification by the Hearing Officer.)
 6
7
               THE WITNESS: Do I open this up? Is it in here?
8
               MR. GOLDFEDER: It's going to be in a separate
9
      document here. Let me just mark all these.
10
               MS. ROAM: Just so I'm clear, the last document
11
      was 53?
12
               HEARING OFFICER SCULLY: Yes.
               MS. ROAM: Okay. It looks look a 57 on here.
13
14
               MR. GOLDFEDER: Here you go,
15
               THE WITNESS: Thank you.
      BY MR. GOLDFEDER:
16
               So take a chance and opportunity to look at this
17
18
      document and read it to yourself,
                                                   . It's just
      two pages. Let me know when you've had a chance to review
19
2.0
      it and I want to ask you a few questions.
21
               Well, my first question would be why would he put
22
      "a dating/cohabitating relationship." We never
23
      cohabitated, but he's not here it to answer that.
24
            (There was an interruption in the proceedings.)
2.5
      ///
```

1	BY MR. GOLDFEDER:
2	Q Have you had a chance to review this document,
3	?
4	A Yes.
5	Q Now, do you have any personal knowledge if
6	Lieutenant Wiard talked to anyone else about the
7	information that was typed up in this document?
8	A No.
9	Q Okay. Did you talk to anybody, other than
10	Lieutenant Wiard, about the information that was included
11	in this document?
12	A Did I I didn't know of anything that was in
13	this document, so I didn't talk to anybody regarding this
14	document.
15	Q Okay. So if Lieutenant Wiard, based upon the
16	information you talked to him about, provided information
17	in this document, would it be correct to say that that was
18	just a conversation he had with you?
19	A Yes.
20	Q Now, it says that your relationship ended in
21	December of 2014 with Deputy Mandoyan.
22	Does that sound like a date that the relationship
23	came to a conclusion?
24	A Yes.
25	Q And it says since the breakup, the I guess IP

would be the involved party, whatever the term would be, 1 2 and the CP, I guess, the complaining party, would be you -- claims that Deputy Mandoyan had been stalking you, 3 broken into your house and contacted you numerous times 4 5 via text and phone. 6 Is that information you told to Lieutenant Wiard? 7 Α Yes. 8 Now, at that time in December 2014, when it says 9 "contacted numerous times via text and phone," was there any time after December 2014 that there was any text or 10 11 phone conversation between you and Deputy Mandoyan? 12 I -- not that I can remember. 13 Okay. And at that time, December 2014, you were 14 still employed as a deputy sheriff for the County of 15 Los Angeles? Yeah. 16 Α 17 And you were still working over at 18 Universal Studios? 19 Α Yes. 2.0 Q And then on the second page it indicates that you believe that Deputy Mandoyan texted 's wife, 21 22 stating that there was a threesome with you, 23 and 24 Was that information that you provided to 2.5 Lieutenant Wiard?

1	A Yes.
2	Q And your belief that there was a text message
3	sent, was that a text message that you reviewed over the
4	phone number of Deputy Mandoyan?
5	A No. I did not have his phone number.
6	Q That was an anonymous text message?
7	A Yes.
8	Q Okay. Did you receive that particular text
9	message or did someone show it to you?
10	A No. showed it to me.
11	Q Okay. And the spelling is , and I
12	apologize for not stating that earlier.
13	Now, also, during this time frame that this
14	information was provided to Lieutenant Wiard and he
15	contacted this POE Unit, it shows the date of
16	June 23rd, 2015 on the first page.
17	Do you see that on the top?
18	A Yes.
19	Q Is that approximately when you spoke to
20	Lieutenant Wiard?
21	A Yeah.
22	Q So is it correct to say the form was completed
23	the same day you spoke to him?
24	A Highly likely.
25	Q Okay. At that time, let's say well, let me go

back for a minute. 1 2 When you were on the Department, you worked patrol and you got off training at the West Hollywood 3 Station? 4 5 Α Yes. 6 And then after that you went to Universal Studios 7 and worked that patrol assignment? 8 Α Yes. 9 Had you ever gotten to Special Victims Bureau to work as a deputy sheriff at that unit? 10 11 Α No. 12 And are you familiar with the term "coveted testing"? 13 14 Yes. Α 15 Did you ever make an application for a position at Special Victims Bureau? 16 17 Α No. 18 All right. If you could turn to page 2, and I will have questions about the last three lines of the 19 narrative there on Appellant's Exhibit 54. 2.0 21 Did you have a chance to review that? 22 Yes. I'm sorry. 23 So did you tell Lieutenant Wiard that 24 Caren Mandoyan called friends at Special Victims Unit and 2.5 prevented you from getting a position at

1 Special Victims Bureau? 2 According to this I did. I don't remember doing that. 3 Okay. And then the continuation of that 4 0 5 particular statement, in preface you said that -- you 6 stated you missed the filing deadline for 7 Special Victims Bureau and therefore did not put in an 8 application for the position. Did you tell him that also? 10 Α Yeah, I must have. Okay. So on one hand you told Lieutenant Wiard 11 12 that Deputy Mandoyan called friends and prevented you from 13 getting a position at Special Victims Bureau, and then you 14 also told him that you never even applied for the 15 position; is that true? 16 Α Yeah. 17 Okay. So you're blaming Deputy Mandoyan for not getting a position at Special Victims Bureau that you 18 never submitted an application for? 19 2.0 Α No. 21 Okay. Well, can you read the bottom two lines 22 there again and state that that was information that you 23 provided verbatim to Lieutenant Wiard? 24 MS. ROAM: And I'm just going to object. 2.5 been asked and answered.

1	HEARING OFFICER SCULLY: Well, overruled.
2	THE WITNESS: Do you want me to read it out loud?
3	BY MR. GOLDFEDER:
4	Q No, just to yourself.
5	A Okay.
6	Q As you sit here today, in around the time you
7	were talking to Lieutenant Wiard on June 23rd, 2015, did
8	you blame Deputy Mandoyan for not obtaining a position at
9	Special Victims Bureau?
10	A No.
11	Q Okay. And you never even applied for the
12	position; correct?
13	A Correct.
14	Q Okay. Did you get the impression that
15	Lieutenant Wiard was writing down or accepting information
16	you were giving to him accurately?
17	A I believe that he was I don't think he was
18	writing down anything because I was on the phone with him.
19	I don't know what he was doing.
20	Q But he got this information from you?
21	A Yeah. Absolutely.
22	Q Okay. So Deputy Mandoyan doesn't have, as far as
23	you're aware, any ability to prevent you from applying at
24	any job on the Sheriff's Department?
25	A No. I could have applied.

1	Q Okay. So after December 2014, were you having
2	any further discussions with Deputy Mandoyan going into
3	January of 2015?
4	A I don't know.
5	HEARING OFFICER SCULLY: You don't remember?
6	THE WITNESS: I don't remember. It's been years.
7	I can't
8	BY MR. GOLDFEDER:
9	Q Well, let's go back to, let's say, March of 2014.
10	You two were still dating at that time?
11	A Yes.
12	Q And during that time, would you reach out to
13	Deputy Mandoyan in regard to, you know, assistance in
14	writing reports, for example?
15	A Yeah.
16	Q Okay. And would Deputy Mandoyan help you or
17	write your reports for you?
18	A Yeah.
19	Q Okay. And at that time was Deputy Mandoyan still
20	at West Hollywood Station, let's say, March of 2014?
21	A No.
22	Q Had he transferred to South Station at that time?
23	A I believe so, yes.
24	Q How often do you recall having to reach out to
25	Deputy Mandoyan during that time, let's say, between March

```
and December of 2014 for questions or, you know,
1
2
      assistance with writing reports, things of that nature?
               I don't recall.
 3
               Would you say that he helped you on those
 4
      occasions when you did call or contact him?
 5
 6
           Α
               Yeah.
 7
           Q
               Okay. Did he ever tell you, No. Do it yourself.
8
      I'm not going to help you?
               Not that I can recall.
               So going into, let's say, past December 2014 --
10
11
      first of all, do you have a cousin that you talk to?
12
           Α
               Yes.
               Who is that?
13
14
                     -- I have a lot of cousins.
           Α
                                                         though,
      I'm guessing, is who you are referring to.
15
16
                           's last name?
           Q
               What's
17
           Α
18
                Did you have discussions with Caren about when
19
      you would talk to your cousin,
2.0
           Α
                Yeah.
                       That's seems reasonable.
21
               Caren ever tell you you're not allowed to talk to
22
      vour cousin?
23
           Α
               Yeah.
24
           Q
               And when did that take place?
2.5
               I don't know, like, specifically.
           Α
```

But you specifically remember him telling you 1 2 you're not allowed to talk to your cousin? 3 Α Yeah. Did you text message Deputy Mandoyan from your 4 5 phone? 6 Α All the time. 7 HEARING OFFICER SCULLY: I'm sorry. I didn't 8 hear your answer. THE WITNESS: All the time. BY MR. GOLDFEDER: 10 11 Did Deputy Mandoyan ever tell you that you're 12 allowed, or that he never prevented you from talking to 13 your cousin 14 Not to my recollection. 15 I want to show you a text message here and see if I can refresh your recollection. 16 17 MR. GOLDFEDER: I quess this will be 18 Appellant's Exhibit 55, next in order. 19 (Appellant's Exhibit 55 was marked for 2.0 identification by the Hearing Officer.) 21 HEARING OFFICER SCULLY: Thank you. 22 BY MR. GOLDFEDER: 23 Here, 24 And looking at Appellant's Exhibit 55, does that 2.5 look like a text message that went back and forth between

1	you and Deputy Mandoyan?
2	A It could have been, yeah.
3	Q Okay.
4	HEARING OFFICER SCULLY: Well, do you recognize
5	it or not?
6	THE WITNESS: I don't I mean, through the
7	course of our relationship, sir, we sent billions of text
8	messages, so to say that this is to remember the
9	specifics, I mean, it's possible. Is it possible, yeah.
10	It's possible this is a message or conversation we had at
11	the time.
12	HEARING OFFICER SCULLY: But you don't have a
13	specific recollection?
14	THE WITNESS: No. I don't have any specific
15	recollection, no.
16	BY MR. GOLDFEDER:
17	Q All right. So you don't remember Deputy Mandoyan
18	saying you can have a conversation with your cousin?
19	A It's what it's saying, that I could.
20	Q Well, is that something you said to him:
21	"Am I not allowed to have a
22	conversation with my cousin?"
23	Did you ever make that text message and send it
24	to Deputy Mandoyan?
25	A Yeah.

1	Q Okay. And below that:
2	"Am I not allowed to have a
3	conversation with my cousin," there's a response.
4	It says:
5	"Yes, of course you are."
6	Is that Deputy Mandoyan responding that, you
7	know, you can talk to your cousin?
8	"Of course you can talk to your cousin."
9	A I guess.
10	Q And then below that it says:
11	"You're fucking ridiculous."
12	Is that something that refreshes your
13	recollection as to what you typed?
14	A None of this, sir, really refreshes my
15	recollection at all. I I don't know what this
16	conversation is even regarding. I mean, I see that it's
17	saying:
18	"What, am I not allowed to have a
19	conversation with my cousin?"
20	And him saying:
21	"Yes, of course you are."
22	This really doesn't refresh my recollection of
23	the many multiple messages that we had sent one another
24	over that we had over the course of our relationship.
25	Q And I'm sure there were quite a few text messages

during the course of time of your relationship, but do you 1 2 remember testifying here back on July 26th, 2017, that you indicated that Deputy Mandoyan said that you weren't 3 allowed to talk to your cousin? 4 Yes. I recall that. 5 6 So does this text message, which is 7 Appellant's Exhibit 55, contradict that testimony? For this conversation, specifically, it appears 8 Α 9 to be that it's contradicting. It doesn't mean that it 10 didn't happen. 11 Okay. So when it says: 12 "Yes, of course you are allowed to 13 have a conversation with your cousin," that's 14 referencing your cousin 15 Is that who you were testifying about here back on June -- July 26, 2017? 16 17 Α Yes. 18 Okay. And then Deputy Mandoyan below: 0 19 "You're fucking ridiculous," replies: "Thanks for the kind words." 2.0 21 Do you recall that at all? 22 Sir, I don't recall this specific conversation. 23 Am I saying I did it, no, it's here that I did it. I 24 don't recall --2.5 Okay. Is it fair to say that you probably don't

have a recollection of a lot of text messages or 1 2 conversations you had with Deputy Mandoyan during the time you were involved in a relationship together? 3 Α Yeah, the specifics. 5 Okay. When you text Deputy Mandoyan -approximately when in December of 2014 did this breakup 6 7 take place? You know, was it before Christmas, after 8 Christmas, do you have any time line you can provide to us? I believe it was before Christmas. 10 11 Okay. And after that, did Deputy Mandoyan 12 continue to send you text messages? 1.3 Α Yeah. 14 Okay. Did you ignore those text messages? 15 I don't -- I don't know. I don't think that the communication was completely cut off until he followed me 16 17 home and tried to break into my apartment and caused such 18 a commotion that my landlord had to come talk to me, and 19 that's when I talked to him following my conversation with 2.0 her, and told him that I couldn't talk to him anymore, he 21 couldn't come over, because I didn't want to risk my place 22 where I live, so --23 MR. GOLDFEDER: I want to motion to strike at

this point. Nonresponsive, also narrative.

24

2.5

///

1	BY MR. GOLDFEDER:
2	Q My question was:
3	"Did you have text message
4	communication with Deputy Mandoyan after
5	December 25th, 2014?"
6	A Yes, it's possible.
7	Q Would that refresh your recollection if you
8	review some text messages from that time frame?
9	A If you're going to be asking me specific
10	questions about them, then I would like to be refreshed.
11	Q Certainly. I would be happy to provide that.
12	MR. GOLDFEDER: I'll mark next in order
13	Exhibit I think we're up to 56, Appellants Exhibit 56.
14	And Appellant's Exhibit 56 consists of 5 pages all stapled
15	together.
16	(Appellant's Exhibit 56 was marked for
17	identification by the Hearing Officer.)
18	HEARING OFFICER SCULLY: Thank you.
19	BY MR. GOLDFEDER:
20	Q So look at those five pages, , and tell
21	me when you get a chance to review those.
22	A Okay.
23	Q So it shows the date on the top of
24	Appellant's Exhibit 56. It shows December 27, 2014, at
25	11:59 p.m. It also shows the same first page, the date

December 20th, 2014, 12:38 a.m. 1 The license plate -- or actually, the driver's 2 license that's depicted in this photograph; is that 3 something you're holding in what looks like your left 4 hand? 5 6 Α Yes. 7 And what was the purpose of this text message? 0 8 Α To help me with my report. 9 Okay. So was that something you texted to Q Deputy Mandoyan after Christmas of 2014? 10 11 Α Yes. 12 And prior to this text message, this one that's episode -- that you testified to back in your first 13 14 appearance here, dealing with Deputy Mandoyan coming over 15 to your house, trying to break into your house, or was 16 that a different time reference? 17 Well, there was two separate occasions, so I 18 don't know which was which, but --19 Well, the one where you claim you were followed 2.0 home from work. 21 I think this -- well, this was before that. 22 This was before that? 23 HEARING OFFICER SCULLY: I'm sorry. I'm getting lost with the "this" and the "that." 24 2.5 You're saying the text message occurred before

the incident that you just testified to where he followed 1 2 you home? 3 THE WITNESS: I believe so, yes. BY MR. GOLDFEDER: 4 5 All right. So the time where you said he was 6 trying to get into your house, that was the sliding glass 7 door event. We can refer to it that way. 8 Α Well, the sliding glass door event, I believe, 9 was prior to this event. Okay. So sometime before Christmas of 2014; 10 11 correct? 12 Α Yes. And so in Exhibit -- Appellant's Exhibit 56 here, 13 14 we have Deputy Mandoyan sending you a narrative for a --15 looks like a probable cause declaration for a report, and page 3 indicates it looks like Deputy Mandoyan was working 16 17 on your narrative now. 18 Was that something you reached out to 19 Deputy Mandoyan on December 27th and December 28th, 2014, 2.0 for him to help write a report for you? 21 Α Yeah. 22 And this was after the purported event with the 23 sliding glass door that occurred at some juncture before 24 December 25th, 2014; correct? 2.5 Α Yes.

1 Okay. And then on page 4 of 2 Appellant's Exhibit 56, you indicate you thanked him for writing the report and indicated that, "I love you." 3 Do you remember sending that and saying that to 4 5 Deputy Mandoyan on December 28th, 2014? 6 Α Yes. 7 How long after the sliding door incident was this 0 December 27, 2014 and December 28, 2014 text message? 8 Α I don't know. Was it a week later? 10 0 Sir, I honestly have no recollection as to the 11 Α 12 specific dates. So when you say the relationship ended in the --13 14 looks like the POE report to Lieutenant Wiard, which was Appellant's Exhibit 54, that "Deputy Mandoyan had broken 15 16 into her house," so that would have been at some point before June 23rd, 2015? 17 18 Α Yes. And the dating/cohabitating relationship ended in 19 2.0 December 2014; correct? 21 It was never a cohabitating relationship, but our 22 dating relationship did end in December 2014. 23 So when it indicates that "dating/cohabitating 24 relationship," that's not information you provided to 2.5 Lieutenant Wiard?

1	A No.
2	Q What about, "the relationship ended in 2014"?
3	Did you provide that to Lieutenant Wiard or not?
4	A Yes.
5	Q So you're saying some things in here are things
6	you provided and some things are pieces of information you
7	did not provide?
8	A I did not ever, and I have never, and I maintain
9	that I have never, cohabitated with him. We have never
10	lived together. I would not have provided that
11	information to anybody.
12	Q Okay. So your relationship ended in
13	December 2014, before Christmas; correct?
14	A Yes.
15	Q And he'd broken into your house with the sliding
16	glass door episode at some time before December 2014?
17	A Correct.
18	Q Okay. And you never made a report about any of
19	those events in and around any time frame in 2014;
20	correct?
21	A Correct.
22	Q So when you contacted Lieutenant Wiard on
23	June 23rd, 2015, that was in response to receiving some
24	anonymous text messages?
25	Δ νος

Then you made this report to Lieutenant Wiard, 1 2 who in turn contacted the POE Unit? 3 Α Yes. So then you're having contact with 4 5 Deputy Mandoyan after this relationship concluded before Christmas of 2014 as evidence in Appellant's Exhibit 56; 6 7 is that true? 8 Α Yes. 9 So were you still dating Deputy Mandoyan at that Q 10 time, 11 Α No. 12 What was your relationship at that time -- and I'm referring to after Christmas, December 25th, 2014? 13 14 Amicable, friendly, friends. 15 And you stayed in contact with him even after this purported trying to break into your house event that 16 17 happened some unknown date in 2014? 18 Α Yes. 19 But you never reported that to any police agency? Q 2.0 Α No. Not until after. 21 Until after you got these derogatory anonymous 0 22 text messages? 23 Α Correct. 24 And in January of 2015, were you still contacting 2.5 Deputy Mandoyan by text to write police reports for you?

1 Α It's possible, yeah. 2 Would it help to refresh your recollection to see if he was doing that in January of 2015? 3 Α Okay. 4 5 It would help refresh your recollection? 6 It's not unlikely that he helped me. We were 7 still friends. Like I said, it was a matter of when he 8 made such a commotion of when he followed me home, is when I was contacted by my landlord and threatened that she would have to ask me to leave if that incident -- an 10 11 incident like that happened again --12 MR. GOLDFEDER: Again, motion to strike as 13 nonresponsive at this point. 14 HEARING OFFICER SCULLY: Well, that will be 15 granted, but -- because he didn't ask you about that. 16 asked you if you recall -- I think you're sort of 17 acknowledging you did ask him to help --18 THE WITNESS: Yeah. 19 HEARING OFFICER SCULLY: -- did ask him to help 2.0 you with reports in January; right? 21 THE WITNESS: Yes. 22 BY MR. GOLDFEDER: 23 Okay. So you don't need to see that. You agree that you're sending him text messages and he's writing 24 2.5 your reports in January of 2015?

1	A Yes.
2	Q Okay. And that's post-breakup, after Christmas
3	2014; correct?
4	A Correct.
5	Q And that's well past the purported sliding glass
6	door event from some point in time earlier in 2014;
7	correct?
8	A Yes.
9	Q Did Deputy Mandoyan, in January of 2015, come up
10	to Universal Studios and go to a, you know, restaurant or
11	a location up there?
12	A Yes.
13	Q Okay. And did you contact anyone to, you know,
14	help him get into the restaurant location up there in
15	Universal CityWalk?
16	A Not that I can recall.
17	Q Would it help refresh your recollection if I
18	showed you a text message?
19	A Sure.
20	MR. GOLDFEDER: I believe we're up to Exhibit 57
21	for the Appellant.
22	(Appellant's Exhibit 57 was marked for
23	identification by the Hearing Officer.)
24	HEARING OFFICER SCULLY: Thank you.
25	MR. GOLDFEDER: Here you go,

1	THE WITNESS: Thank you.
2	BY MR. GOLDFEDER:
3	Q So on January 25th, 2015, were you still assigned
4	at Universal CityWalk for the LA County Sheriff's
5	Department?
6	A Yes.
7	Q Now, with the first entry here at 9:12 p.m. on
8	January 25th, 2015, in Appellant's Exhibit 57, it
9	indicates:
10	"He's on his way up to get you in."
11	That was a text message you sent to
12	Deputy Mandoyan.
13	Can you tell us who was on his way up to get him?
14	A I have no idea. I don't recall this
15	conversation.
16	Q Do you recall you got a response:
17	"They got me in. I'm good. Thank you"?
18	A No.
19	Q And what was your normal shift when you worked
20	over at Universal CityWalk? What hours did that
21	encompass?
22	A I don't remember. Might have been 4:00 to 2:00.
23	4:00 p.m. to 2:00 a.m I don't know.
24	Q Would you get off at 3:00 o'clock, 4:00 o'clock
25	in the morning? Was that a general time reference for

1	when your shift concluded?
2	A Uh-huh. Yeah.
3	Q Is that a "yes"?
4	A Yes, that's a "yes."
5	Q And in reference to this event you're talking
6	about with the following you home from work, do you
7	remember the approximate date that took place?
8	A No.
9	Q When you claim you were followed home from work,
10	was that sometime in January 2015?
11	A I believe it was.
12	Q Okay. And is it possible that that took place on
13	January 25th into January 26th?
14	A I don't know.
15	Q Would you talk to Caren Mandoyan when you were
16	driving home after your shift was concluded at
17	Universal CityWalk in January of 2015?
18	A Yes, sometimes.
19	Q Okay. And would there be times when you would
20	invite Deputy Mandoyan to come to your residence if he
21	wasn't already there in January 2015?
22	A I don't believe so.
23	Q When you would have conversations with
24	Deputy Mandoyan after you broke up, you know,
25	December 2014, before Christmas, would you have long

conversations with him -- or describe those for me after 1 2 Christmas of 2014 when you communicated by phone. I can't describe those for you. I mean, there 3 might have been long conversations, there might have been 4 short conversations. I really can't justify the 5 specifics. 6 7 HEARING OFFICER SCULLY: So you're saying you don't remember? 8 THE WITNESS: I don't remember. HEARING OFFICER SCULLY: You don't remember what 10 11 you talked about or the nature of the conversations? 12 THE WITNESS: I -- no. HEARING OFFICER SCULLY: It's all blank? 13 14 THE WITNESS: I mean, for the most part, I don't 15 have any -- I mean, if we were taking about my night -- I mean, I'm just trying to think what normal people would 16 talk about. 17 HEARING OFFICER SCULLY: Well, you shouldn't 18 19 speculate on what normal people might talk about, but 2.0 rather give your recollection, your testimony --21 THE WITNESS: I don't -- I don't have --22 HEARING OFFICER SCULLY: Wait, wait, wait. 23 me finish. Let me finish -- give your testimony about 24 what you and he talked about in that time frame that month after you broke up -- but you don't have any recollection? 2.5

1	THE WITNESS: I don't have any recollection.
2	BY MR. GOLDFEDER:
3	Q Did you invite Deputy Mandoyan to come home with
4	you on January 26th, 2015, after you got off shift while
5	he was at the Universal CityWalk?
6	A No. I don't believe I did.
7	Q Did you have a conversation with him that took
8	about 26 minutes on January 26th at 3:18 in the morning
9	while the two of you were driving back to your residence
10	in El Segundo?
11	A If no. I did not invite him back.
12	Q What was your phone number back in 2015? I'm
13	referring to your cell phone number.
14	A something. I don't know the last
15	four.
16	Q ?
17	A Sounds about right.
18	Q Okay. Let me try to refresh your recollection
19	with another document here,
20	MR. GOLDFEDER: I believe we're up to
21	Appellant's 58.
22	HEARING OFFICER SCULLY: Are you cold?
23	THE WITNESS: Yes.
24	HEARING OFFICER SCULLY: Do you have a jacket?
25	THE WITNESS: No.

```
1
               HEARING OFFICER SCULLY: Why don't we try to
2
      adjust the thermostat.
 3
               THE WITNESS: I'm sorry. It's okay. Thank you.
           (There was an interruption in the proceedings.)
 4
               HEARING OFFICER SCULLY: So we have Exhibit 58
 5
 6
            It's one page of Verizon Wireless call detail.
 7
                (Appellant's Exhibit 58 was marked for
 8
               identification by the Hearing Officer.)
9
               MR. GOLDFEDER: Correct.
      BY MR. GOLDFEDER:
10
11
               You indicated your number back in January 2015
12
      was
13
           Α
               Yes.
14
               If you look at Appellant's Exhibit 58 in front of
15
      you, if you look at the fifth entry down -- well,
16
      actually, look at the fourth and fifth entry down.
17
               You see there was a phone call you made to
18
      Deputy Mandoyan at 3:14 a.m.?
19
           Α
               Okay.
2.0
           Q
               A two-minute phone call?
21
           Α
               Okay.
22
               Do you recall that?
           0
23
           Α
               No, but --
24
               How about the next entry at 3:18 a.m. in the
2.5
      morning. Looks like there is a 26-minute phone call to
```

Deputy Mandoyan; do you remember making that phone call? 1 2 I don't remember making any of these phone calls, but they're on here, so I must have. 3 So those phone calls go to your cell phone number 4 0 5 you had back in January 2015? 6 Α Yes. 7 So you make a 26-minute phone call at 3:18 in the 0 8 morning to Deputy Mandoyan. Do you remember what that 26 9 minutes of conversation consisted of? 10 Α No. 11 But you called him; correct? 12 It says "incoming," so yes. Α 13 Q And you were broken up December 25th, 2014, 14 according to your testimony; isn't that true? 15 Α Yes. And according to what you told Lieutenant Wiard 16 17 on June 21st, 2015, that your dating/cohabitating relationship ended in December of 2014; isn't that 18 19 correct? 2.0 Our dating relationship ended in 2014. 21 Well, I was reading from the document, so the 22 document says "dating/cohabitating relationship" that 23 ended in December of 2014. 24 MS. ROAM: And I would just object. He's 2.5 misstating the testimony. She's been very clear that they

did not cohabitate. 1 2 HEARING OFFICER SCULLY: Well, I agree with you, but I think also he's reading the report which also does 3 say their "cohabitation relationship." So I don't think 4 5 there's -- it's more of semantics, but I heard her 6 testimony saying she never had that cohabitating 7 relationship, and --BY MR. GOLDFEDER: 8 But you indicated in your testimony back on 10 July 26, 2017, that Deputy Mandoyan stayed with you, what 11 was it, three or four nights a week? 12 Α Yeah. 1.3 Okay. And after December 2014 when you claimed 14 the relationship ended, can you tell us the reason you're 15 calling Deputy Mandoyan at 3:18 in the morning for a 16 26-minute conversation? I must have been off of work. It wasn't unlike 17 us to continue talking after -- I don't know what I 18 19 specifically talked about. I evidently did, but to tell 2.0 you what we talked about, I have no idea. 21 And this would be in relation to him being up in 22 Universal CityWalk on January 25th, 2015, 9:00 o'clock in 23 the evening. You indicated that: "He's on his way up to get you in." 24

2.5

Α

Okay.

1 Was that some kind of nightclub or a movie 2 theater to get Deputy Mandoyan into over at Universal CityWalk? 3 I have never gotten Deputy Mandoyan into a 4 5 nightclub or anything for that matter there or anywhere --6 Okay. So --7 -- so I don't know what this is really referring Α 8 to. Well, you agree you're sending text messages to Q Deputy Mandoyan on January 25th, 2015; correct? 10 11 I agree that you have messages from my phone. 12 don't recall this conversation and in what regards anybody 1.3 helped him get into. 14 Okay. So you do not have any recollection of who 15 was coming up to let Deputy Mandoyan in on January 25th, 2015 at 9:12 p.m., as reflected in Appellant's Exhibit 57; 16 17 is that your testimony? 18 Α Yes. Okay. And that was after your relationship ended 19 Q 20 at some point in time before Christmas, December 2014; 21 correct? 22 Α Correct. 23 And what I'm trying to ascertain is after your 24 relationship ended, as you told Lieutenant Wiard and as 2.5 you testified here to here on July 26th, 2017, what a

26-minute phone call with Deputy Mandoyan encompassed at 1 2 3:18 in the morning on January 26th, 2015? Sir, I don't know what it encompassed. I don't 3 recall having this conversation. So is it correct to say that you were still in a 5 6 relationship with Deputy Mandoyan in January the 26th of 7 2015? 8 Α No. 9 But you're contacting somebody that you told 10 someone else that you ended a relationship with the prior 11 month? 12 I don't understand, but -- I'm sorry. Α 1.3 Well, you told Lieutenant Wiard that your 14 relationship ended in December 2014 with Deputy Mandoyan, 15 and now you testified here that it occurred before Christmas in December; do you remember that testimony? 16 Yes. So sometime in December I ended our 17 Α relationship -- our dating relationship. 18 This doesn't mean that we're still dating, just means that we're still 19 2.0 talking. 21 Still talking at 3:18 in the morning with someone 22 you no longer were in a dating relationship with? 23 Sure. I'm looking at all of these and it appears 24 that all of these below the next highlighted are all 2.5 incoming -- or outgoing calls from him to me.

So our conversation ended. That 26-minute 1 2 conversation ended. I have no idea what it was that we talked about, but it appears he continued to call me in 3 one minute increments --5 Well, let me ---- several times after that. I don't know --6 7 Let me stop you there, because there's no 0 8 question pending. So after that 26-minute conversation, it appears 10 there is probably about -- looks like there's probably close to 25 calls from you to Deputy Mandoyan between the 11 12 hours of 3:44 a.m. and 4:07 a.m. on 1.3 Appellant's Exhibit 58. 14 MS. ROAM: I'm going to object. That misstates 15 the evidence. 16 HEARING OFFICER SCULLY: I don't know who's 17 calling who. I can't really interpret this. 18 MS. ROAM: Well, the 26-minute call that she just talked about says "incoming." All of the others are 19 2.0 outgoing calls from his number to her number. 21 HEARING OFFICER SCULLY: How do you know that? 22 MS. ROAM: Because I know how to read a phone 23 bill. HEARING OFFICER SCULLY: So you're -- that's your 24 2.5 interpretation. Oh -- I don't know. I'm trying to figure

it out myself, but I don't want to make an assumption if 1 2 there is some way, you know -- I understand that where it says "incoming" it might imply that the other calls were 3 outgoing, but I would like to see something a little more 4 definitive than this. 5 6 BY MR. GOLDFEDER: 7 So was this the day, January 26th, 2015, where 8 Deputy Mandoyan is present at your house and he was trying to have a conversation with you at the rear window that you filmed in some video? 10 11 Α Is this the specific day? I'm sorry --12 0 Yes. Is this the same day that you got your video camera out? 1.3 14 It's possible. I don't know the --15 Okay. Thank you. So you don't have a recollection of even being in a relationship or having 16 17 conversations with him after Christmas 2014, but now 18 you're calling Deputy Mandoyan at 3:18 in the morning when 19 he was apparently up at Universal CityWalk. 2.0 Was that a preplanned date or get-together for 21 the two of you? 22 Α No. 23 Back in January of 2015, did you like working as 24 a deputy sheriff?

Back in January, no. I didn't like working as a

2.5

deputy. I was being harassed by my at-the-time -- well, 1 2 for the duration of our relationship, no. I did not like being a deputy. 3 Okay. So you didn't like the job or the work as 4 a deputy sheriff? 5 6 Α No. That's not true. 7 You liked working as a deputy sheriff? 0 I mean, I liked working as a deputy sheriff until 8 Α 9 I was restricted from talking to my partners by my at-the-time boyfriend. 10 11 The same boyfriend that prevented you from going 12 to the Special Victims Bureau that you never sent an application in for? 13 14 MS. ROAM: I'm going to object. That's 15 argumentative. HEARING OFFICER SCULLY: Sustained. 16 17 BY MR. GOLDFEDER: Did you tell Deputy Mandoyan in a text message on 18 January 24, 2015, I fucking hate this job? 19 2.0 Α Probably. 21 Okay. And did that have anything to do with 22 Deputy Mandoyan, the reason you fucking hated the job back 23 on January 24th, 2015? 24 Α No. That could be --2.5 Okay. Thank you. Did -- did you hate this job

1	because some drunk bitch kicked you in the fucking face?
2	A Yeah, probably.
3	Q Okay. And did that have anything to do with
4	Deputy Mandoyan?
5	A No. It had nothing to do with him.
6	Q Okay. And you admitted to sending that text
7	message to Deputy Mandoyan?
8	A Yes.
9	Q Now, on June 3rd, 2015, do you recall if you were
10	working at Universal CityWalk?
11	A I don't recall.
12	Q Okay. Would it help refresh your recollection if
13	you looked at an in-service sheet?
14	A Okay.
15	MR. GOLDFEDER: I believe we're up to Exhibit 59
16	for the Appellant.
17	(Appellant's Exhibit 59 was marked for
18	identification by the Hearing Officer.)
19	HEARING OFFICER SCULLY: Thank you.
20	MR. GOLDFEDER: Here you go,
21	THE WITNESS: Thank you.
22	BY MR. GOLDFEDER:
23	Q Do you recognize this document that's
24	Appellant's Exhibit 59, ?
25	A Yes.

Q Can you describe to us what it is?
A It's our in-service.
Q What does an actual in-service mean?
A It's a list of the people that are working and
what unit they're assigned to for the evening.
Q Okay. So on Wednesday, June 3rd, 2015, are you
listed on this p.m. shift in-service for West Hollywood
Station?
A Yes.
Q And where are you listed in this document?
A Universal CityWalk.
Q And that's you, "Unit 95, "?
A Yes.
Q And your hours of 1700 to 0300 in the morning?
A Yes.
Q So you were working and you started your shift at
1700, which is 5:00 p.m. for regular a.m./p.m. meridian
time?
A Yes.
Q On that date, did you contact Deputy Mandoyan by
telephone while you were on duty?
A Not that I can recall.
Q You testified in your interview before
Internal Affairs that you did make a phone call to
Deputy Mandoyan on June 3rd, 2015; do you recall that?

If that was in reference to the text message 1 Α 2 received that day, then yes. Well, I'm asking if you made a phone call to 3 Deputy Mandoyan. I'm not asking about any text messages. 4 5 I'm asking if you contacted Deputy Mandoyan on June 3rd, 2015 --6 7 Α Yes. 8 -- while you were on duty? 9 Α I don't believe -- I don't know if I was on duty I don't recall that. 10 or not. 11 Did you call Deputy Mandoyan, blocking your phone 12 number on June 3rd, 2015, at approximately 5:19 p.m.? I would have blocked my call when I called him. 13 Α 14 So that sounds like something you did do? 0 15 Yes. Α 16 Q Okay. 17 HEARING OFFICER SCULLY: Mr. Goldfeder, we're 18 going to take our noon break now. 19 MR. GOLDFEDER: Oh, I'm sorry. I lost track of 2.0 time. 21 HEARING OFFICER SCULLY: It's all right. We're 22 right at noon. This clock is --23 MR. GOLDFEDER: Way off. 24 HEARING OFFICER SCULLY: And we're not at that 2.5 time yet. So we're going to have to -- we'll take a

```
one-hour break. It's 12:00 o'clock now. We'll break
1
2
      until 1:00.
                          , you're free to go to lunch. There is
 3
      lunch in the building here, there are lunch spots around.
 4
 5
      You can have lunch if you like, and please be back up here
 6
      at 1:00 o'clock.
 7
               THE WITNESS: Yes.
 8
               HEARING OFFICER SCULLY: Thank you.
 9
                      (A lunch recess was taken.)
               HEARING OFFICER SCULLY: Okay. Let's go back on
10
11
      the record.
12
               Mr. Goldfeder, are you ready to resume your
13
      cross?
               MR. GOLDFEDER: Yes, your Honor.
14
15
               HEARING OFFICER SCULLY: Thank you.
      BY MR. GOLDFEDER:
16
17
                          , when you were here on July 26, 2017,
18
      you indicated that you and Mr. Mandoyan were living
19
      together; do you recall that testimony?
2.0
           Α
               No.
21
               Okay. And you were under oath at that time when
22
      you were testifying; do you remember that?
23
           Α
               Yes.
24
               Can you tell us approximately what time you filed
2.5
      for a restraining order against Deputy Mandoyan?
```

1	A I believe it was in July.
2	Q Is that July 14th of 2015; does that sound
3	correct?
4	A Yes.
5	Q At the time you submitted for this restraining
6	order, that was after you were receiving these anonymous
7	text messages that you found to be inappropriate or
8	offensive?
9	A Yes.
10	Q And the tone of the text messages was basically,
11	you know, get a life, you don't belong here, stay away
12	from co-workers, or something to that effect?
13	A Yes.
14	Q And at that juncture, did you reach out and talk
15	to Deputy Mandoyan just prior to when you submitted your
16	policy of equality complaint to Deputy Wiard?
17	A Yes.
18	Q And did you ask Deputy Mandoyan if he was sending
19	you these anonymous text messages?
20	A Yes.
21	Q And what did Deputy Mandoyan say to you?
22	A He said he did not.
23	Q And would you say that was the provoking event
24	for you to reach out to Lieutenant Wiard, these text
25	messages?

1 Α No. So when you were getting these text messages, you 2 contacted Deputy Mandoyan, he said it wasn't him sending 3 them, and then how long after that did you reach out to 4 Lieutenant Wiard? 5 MS. ROAM: I'm sorry. Just for the record, it's 6 7 Lieutenant Wiard, that's W-i-a-r-d. 8 MR. GOLDFEDER: Wiard. I apologize. 9 BY MR. GOLDFEDER: How long after this conversation with 10 11 Deputy Mandoyan did you reach out to Lieutenant Wiard? 12 I don't recall. Α 13 Would it be a few days later? 14 Possibly. Α 15 And reaching out to Lieutenant Wiard after Deputy Mandoyan told you he wasn't sending these text 16 messages, what was the purpose in contacting the 17 18 lieutenant at that time? 19 To get Deputy Mandoyan to leave me alone. 2.0 Q But he told you he wasn't sending you these text 21 messages; is that correct? 22 Α Yes. You thought he was sending you these text 23 24 messages? 2.5 Α Yes.

1	Q At some juncture, did you find out that it was in
2	fact sending you these text messages,
3	who's also known as ?
4	A No. Not that I recall.
5	Q You don't recall that?
6	A No.
7	Q You don't recall telling you
8	that?
9	A No.
10	Q You don't recall telling that to ?
11	A No.
12	Q So at that juncture, had you made any police
13	reports about any of this conduct in 2014 or 2015 to any
14	law enforcement agency?
15	A No.
16	Q And at that point in time after you spoke with
17	Lieutenant Wiard on June 23rd, 2015, did you go to the
18	El Segundo Police Department that day?
19	A Not on that day, I don't believe.
20	Q And July 14th or, strike that.
21	You spoke to Deputy Mandoyan sometime in June
22	before the 23rd of 2015, and you had this conversation
23	where he told you he wasn't sending you text messages;
24	correct?
25	A Yes.

And July 14, 2015, is when you filed a 1 2 restraining order over at the North Valley District Chatsworth Courthouse? 3 Α Yes. 5 And did you go there with 6 Α Yes. 7 there, or how did the Did you meet Q 8 two of you arrive at the Chatsworth Courthouse? Α I believe I met her there. So after making the phone call to 10 11 Lieutenant Wiard back on June 23rd, 2015, did you have any 12 interactions with Deputy Mandoyan between that date and July 14, 2015, when you went to the Chatsworth Courthouse 13 14 to file your restraining order? 15 No. I did not. 16 So you had no contact with Deputy Mandoyan after 17 you reached out to him to ask him about these anonymous 18 text messages? 19 Α Correct. 2.0 Q As a deputy sheriff, did you receive training in 21 temporary restraining orders? 22 Α Yeah. 23 Is that part of your patrol training and/or 24 academy training? 2.5 I mean, it might have touched on it.

How about emergency protective orders? 1 2 Have you ever gotten any experience or indoctrination with those documents in your duties as a 3 patrol deputy? 4 5 Α Yes. 6 And that's basically like a temporary restraining 7 order that victims of certain crimes can request? 8 Α Yes. 9 And you handled a few of those during your 0 10 career? 11 Α One or two, yeah. 12 Did you ever reach out to Deputy Mandoyan to have 13 him help you fill out an emergency protective order as 14 part of your duties as a patrol deputy over at the 15 West Hollywood Station or Universal CityWalk? 16 Α I might have. 17 Okay. So other than these text messages that --18 anonymous text messages, I'm sorry -- that you were 19 receiving back in early 2015, what was the purpose of you 2.0 going to Chatsworth Courthouse to file this restraining 21 order on July 14th, 2015? 22 that Caren had followed me I was told by 23 on a date to Rock & Brews, and also when I had talked to 24 Caren about the text messages, he also made a comment as

he knew who I was having sex with because that person

2.5

sounded like a chick. So I asked him how he would have 1 2 known who I was sleeping with, and he told me, I have eyes and ears everywhere. So that's --3 4 And that was the reason you went over to the courthouse? 5 6 MS. ROAM: I'm sorry. I would ask that the 7 witness be allowed to finish her answer. HEARING OFFICER SCULLY: I don't think she was 8 9 quite finished, so --10 MR. GOLDFEDER: Oh. I'm sorry. 11 THE WITNESS: Those would have been my motivating 12 factors to get a restraining order. BY MR. GOLDFEDER: 13 14 Okay. Did you ever see Caren -- Deputy Mandoyan 15 following you? 16 Α No. 17 Did Deputy Mandoyan ever come to your residence after this relationship concluded with the little scenario 18 here on January 26th, 2015? Is that the last time you and 19 2.0 Deputy Mandoyan saw each other? 21 He did come to my house and he had informed 22 of that, but I didn't see him personally, 23 but he thought that I had seen him because he reached out 24 to her and then she reached out to me and said, Please 2.5 don't get involved --

1	MR. GOLDFEDER: Motion to strike as hearsay and
2	nonresponsive at this point.
3	HEARING OFFICER SCULLY: Can I have the question
4	Back?
5	(The record was read by the court reporter.)
6	HEARING OFFICER SCULLY: Okay. Motion's granted.
7	Can you answer that question?
8	THE WITNESS: Yes.
9	HEARING OFFICER SCULLY: Please answer.
10	THE WITNESS: Can I pick up where I left off?
11	HEARING OFFICER SCULLY: Well, just answer the
12	question. I think it's a "yes" or a "no."
13	THE WITNESS: Oh. Okay. I believe so, yes.
14	BY MR. GOLDFEDER:
15	Q And when did you see Deputy Mandoyan after
16	January 26, 2015?
17	A When did I see him? I don't know a specific
18	date. I mean, I did see him, I want say it was in June,
19	prior to me getting ahold of Lieutenant Wiard.
20	Q And what were the circumstances behind seeing him
21	in June 2015?
22	A To tell him to leave me alone. It was my last
23	plea for him to just leave me alone and move on with his
24	life.
25	Q And that was in response to the anonymous text

1	messages that you were receiving?
2	A Yes.
3	Q That he already told you or, strike that.
4	When you had this conversation with
5	Deputy Mandoyan about these text messages that he said he
6	was not sending you, was that over the phone or in person?
7	A It was well, there was occasions over the
8	phone, and this one particular occasion in person.
9	Q And did you invite Deputy Mandoyan over to talk
10	to you in person about this?
11	A Yes.
12	Q Okay. And this was after you were purportedly
13	followed home by him on January 26th, 2015?
14	A Correct.
15	Q When you submitted your application restraining
16	order, you didn't tell the court that you had met up with
17	Deputy Mandoyan and invited him over to your house in
18	June of 2015; did you?
19	A No.
20	Q And you indicated on January 26th, 2015, at
21	0345 hours:
22	"Caren Mandoyan followed me home from
23	work and broke into my house."
24	Was that the same day that you were having a
25	conversation with Deputy Mandoyan on the phone at 3:18 in

1 the morning? 2 Α Yes. And was that the same date that Deputy Mandoyan 3 0 was already up at Universal CityWalk? 4 5 Α Yes. Okay. You didn't indicate in your restraining 6 7 order that you filled out to the court that you were talking to Deputy Mandoyan at 3:45 in the morning on 8 January 26th, 2015, did you? 10 Α No. Now, you filled out the restraining order 11 12 application in your own handwriting? 13 Α Yes. 14 Anybody assist you with this? 0 15 Α No. 16 have any role in you filling Q Did 17 out this application restraining order on July 14, 2015? 18 She picked up the packet for me and went with me Α 19 to file it. 2.0 Q And she what? 21 She went with me to file it. Α 22 Okay. Did she file a restraining order herself? 0 23 Α I don't think so. I don't think she did. 24 0 And then with the correct date for this 2.5 alleged -- referring to the sliding glass door event,

would that be December 27th, 2014? 1 2 It might have been. Okay. So that would have been two days after 3 0 Christmas 2014 when you two officially broke up? 4 5 Α Yes. 6 And you didn't indicate in your restraining order 7 that you filed on July 14, 2015, that you were still in 8 contact with Deputy Mandoyan in and around this time and 9 he was texting you in response to your text for assistance 10 on report writing. 11 You didn't put that in -- any of this information 12 in the restraining order, did you? 13 Α No. 14 Now, after the restraining order -- temporary 15 restraining order was provided to you, did you ever go back to court and appear in front of a judge to talk about 16 17 these purported events? 18 Α No. 19 And although the restraining order was filed over 2.0 at Chatsworth Courthouse on July 14, 2015, there was a 21 hearing date scheduled for August 4th, 2015, but it was 22 over at the Inglewood Courthouse; do you remember that? 23 Α Yes. 24 And you never went to the Inglewood Courthouse on 2.5 August 4th, 2015?

1 Α No. 2 When you got this restraining order, at some point in time did you dismiss the order? 3 4 Α No. So you never filled out a document in your own 5 6 hand stating that you were not going to go forward with 7 this order? Yes, I did. I'm sorry. I didn't understand what 8 9 dismiss it meant. Yes, I did. 10 Did anybody force you or threaten you to go 11 dismiss this restraining order when you filled it out to 12 have it dismissed? 13 Α No. 14 So you did that voluntarily on your own? 0 15 Α Yes. Did Mr. Mandoyan ever contact you and threaten 16 Q 17 you about dismissing this restraining order? 18 Α No. 19 And did you sign an agreement, or -- strike that. Q 20 As a deputy sheriff, were you a member of the 21 Deputy sheriffs' Association known as ALS? 22 Α Yes. That's the -- what does ALS stand for? 23 Q 24 Oh, I don't know what it stands for, but it's our 2.5 union.

1	Q So the Association for Los Angeles Deputy
2	Sheriffs; does that sound correct?
3	A Okay. Yes.
	-
4	Q And did the attorney representing the union have
5	you sign an agreement to stay away from Deputy Mandoyan?
6	A Yes.
7	Q And did you sign that agreement voluntarily on
8	your own?
9	A Yes.
10	Q Now, after you filed the restraining order on
11	July 14th, 2015, did you contact Lieutenant Wiard or
12	anyone else on the Sheriff's Department?
13	A Yes, but I don't know if it was Lieutenant Wiard.
14	I'm pretty sure I let my other lieutenant, Marascola,
15	know.
16	Q And who would that have been?
17	A Lieutenant Marascola would have been my
18	lieutenant at my current unit assignment at the time.
19	Q And that would have been TSP?
20	Transportation Services Bureau?
21	A No. CST.
22	Q CST?
23	A Court Services Transportation, I believe.
24	Q Okay. And that was the same date of
25	July 14, 2015?

1	A Might have been, yeah.
2	Q And at some point were you informed about making
3	a police report?
4	A Yes.
5	Q Who provided you that information about making a
6	police report?
7	A I believe it was Sergeant Zaborniak.
8	Q And how did you have contact with
9	Sergeant Zaborniak?
10	And if you could spell the name for the court
11	reporter, I'm sure she'd appreciate it.
12	A Z-a-b-o-r-n-i-a-k.
13	Q And who was that individual in your chain of
14	command?
15	A At the time he was the Operation Sergeant at CST.
16	Q And you told him about this restraining order?
17	A Yes. I believe I did.
18	Q And how did the conversation come up about making
19	a police report?
20	A He advised me that I should go make a police
21	report, and he even asked if I wanted him to go with me.
22	Q So you filed this restraining order based upon
23	the December 27th, 2014 sliding glass door incident and
24	the January 26th allegedly being followed home from work
25	by Deputy Mandoyan?

Those were the two events that you put into that 1 2 restraining order application; correct? 3 Α Yes. Did you ever -- strike that. 4 5 When did you contact the police agency? I don't have a specific date. It would have been 6 7 after the restraining order, I believe, I'm not sure. Before and after. 8 The same day as the restraining order? 10 Α Possibly. 11 Do you remember calling El Segundo Police 12 Department on the telephone the same day as the restraining order? 13 14 I recall calling El Segundo PD on the telephone, whether it was the same day, I have no recollection of 15 16 that. 17 Okay. Did you go make a counter-report about 18 this event, or did they come out to your residence? 19 Α They came to me. 2.0 Q It was the El Segundo Police Department? 21 Α Yes. 22 Do you remember calling them the same date as the 23 restraining order on July 14th, 2015? 24 Sir, I don't recall calling them on a specific 2.5 date. I know I called them.

1 So I want to understand the sequence here, 2 You go file the restraining order on 3 July 14th, 2015, you have some conversation with the 4 5 sergeant with the complicated name who advises you to go 6 make a police report, and then you contacted the 7 El Segundo Police Department; is that correct? 8 Α I believe so, yes. 9 Okay. Were you ever told by anybody, or do you Q understand what the letters ICIB are? 10 11 Α Yes. 12 What is that? Q Internal Criminal Affairs Bureau, I believe. 13 Α 14 Would it be Internal Criminals Investigation 0 15 Bureau? 16 Α Yes, yes. 17 Were you ever contacted by somebody from ICIB to 18 tell you to make a police report? 19 Α I might have been. 2.0 Would that be this sergeant you're talking about? Q 21 He's the Ops Sergeant at CST -- or he was at Α No. 22 the time. Now he's just a line sergeant. 23 So someone from ICIB contacted you to go make a 24 police report? 2.5 T --Α

MS. ROAM: I would just object that misstates her 1 2 testimony. HEARING OFFICER SCULLY: Well, I think he's 3 asking her a question, so she can -- overruled. 4 5 THE WITNESS: I was told. I was told by 6 Sergeant Zaborniak that I should. I don't remember if 7 ICIB told me to or not. BY MR. GOLDFEDER: 8 Okay. In your transcript at -- when took your interview, do you remember 10 11 telling him that ICIB told you to go make a police report? 12 No. I don't remember that. It was two years Α 13 ago. 14 When you contacted El Segundo Police Department, 0 15 did you tell them you were told by your Internal Criminal Investigation Bureau to make a police report? 16 I don't know if I told them or not. 17 Α 18 Did you call the El Segundo Police Department on 19 your own? 2.0 Α Yes. 21 Did you call 911 or a business line? 0 22 Α I called the business line. 23 And what was the point of making a police report 24 on July 14, 2015, after you filed a restraining order? 2.5 Because I was told to.

1	Q Okay.
2	HEARING OFFICER SCULLY: That's the reason you
3	made the report, because you were told to?
4	THE WITNESS: I mean, yeah, I was told I needed
5	to make a police report, so I made the police report.
6	HEARING OFFICER SCULLY: Okay.
7	BY MR. GOLDFEDER:
8	Q And then Officer Lemus came out to your location
9	when you called up on July 14, 2015, that evening.
10	Does that help refresh your recollection?
11	A Yes.
12	Q Did you ever tell El Segundo Officer Lemus that
13	you were still in contact with Deputy Mandoyan, sending
14	text messages back and forth after December 25th, 2014?
15	A I don't know. Probably not.
16	Q Did ICIB tell you what to say to the
17	El Segundo Police Department when you called them up to
18	make this report?
19	A No.
20	HEARING OFFICER SCULLY: Can I ask a question?
21	MR. GOLDFEDER: Sure.
22	HEARING OFFICER SCULLY: If you're making a
23	police report in July, and you're saying that he broke
24	into your apartment and tried to break in, but you're not
25	telling the police that you also were sending text

messages saying I love you and inviting him to help you with your report writing, aren't you misleading the police department when you mischaracterize it as a relationship that you're a victim of this guy instead of somebody who's asking him for help?

THE WITNESS: Well, I definitely get how that

1.3

2.0

2.5

THE WITNESS: Well, I definitely get how that portrays to be, but our relationship was very volatile.

It's always hot and cold, up and down. I mean, me making this report, yeah, I should have put in there that we were still in contact for a couple -- for a month after he had broken into my house, but I didn't, and like I said, our relationship was hot and cold all the time.

So it wasn't me trying to recall specifics as far as, These are the things that he did, this is what my main complaint is and these are the laws that he broke. That was more the, I guess, meat and potatoes of the report, but, I mean, yeah. I did reach out to him and ask for help. We were friends and we were friendly until he followed me home and started pounding on the door and --

HEARING OFFICER SCULLY: That was -- you were talking about January 26th?

THE WITNESS: Yeah. That's when he did it. Yes.

HEARING OFFICER SCULLY: But in questioning

earlier you were asked about what did you talk about for

that -- what, how many minutes?

MR. GOLDFEDER: 26 minutes.

2.0

2.5

HEARING OFFICER SCULLY: 26 minutes, and you had no idea what you talked about; right? Is that right? You don't remember?

THE WITNESS: Correct. Well, I remember now, if that's the date in question that he came to my house uninvited, then I know exactly what we talked about on the way home -- my way home.

HEARING OFFICER SCULLY: So earlier when you were being asked questions, you just couldn't recall this 26-minute phone conversation on the 26th of January? You didn't match up in your mind that's the date he came over to your house uninvited?

THE WITNESS: It's only because it wasn't unusual for us to talk during me coming home or during me being at work. I never -- I don't know the specific dates in which these events occurred. Every date that I have given thus far has been a generalization of the dates.

So when he was asking me earlier, On this date you had a 26 minute conversation, I don't recall it being that specific date in which he broke into my house, but since that is the date, yes, I know exactly what I was saying for 26 minutes.

HEARING OFFICER SCULLY: Okay. Did you make a police report to help you put an end to this relationship,

to break up with him? Is that --

2.0

2.5

THE WITNESS: No. I made a complaint to the Department to help me get him to leave me alone because after this January event, that was it. And I thought it was it, until I started receiving text messages and people telling me that he was following me on a date and his own words, standing in front of my face telling me that he listened to me have sex with somebody else.

That's when I was like, it's been months, you need to move on with your life, and I can't move on with mine -- I mean, I can, but now I feel like you're still watching me. So I made a complaint to the Department so he would just leave me alone.

And I've always maintained, again, none of this is what I wanted. None of it. I didn't go through with the -- I went through with the TRO, but I didn't go through with the hard restraining order because I never wanted him to lose his job.

HEARING OFFICER SCULLY: Okay. All right.

Mr. Goldfeder.

MR. GOLDFEDER: Thank you, your Honor.

BY MR. GOLDFEDER:

Q So these dates that we're talking about now, you actually wrote in your application for restraining order that on January 26, 2015, at 0345 hours:

1	"Caren Mandoyan followed me home
2	from work and broke into my house."
3	So you'd already known that date when you
4	submitted that document to the court on July 14th, 2015;
5	correct?
6	A I guess. Yeah, but in later in being
7	questioned about it later, time had passed, so I didn't
8	know specific dates.
9	Q But you wrote down that specific date in your
10	document under penalty of perjury you submitted to the
11	Superior Court out in Chatsworth; true?
12	A True.
13	Q Okay. And you also wrote down the date of
14	December 27, 2014, and I'm going to refer to that as the
15	sliding door event.
16	You wrote that in your restraining order
17	application you submitted to the Superior Court out in
18	Chatsworth also on July 14th, 2015; correct?
19	A Correct. And at that time
20	Q Okay. And those dates were approximately I
21	don't have my calculator handy, but let's say six,
22	seven months prior to you going into court to file for the
23	restraining order.
24	Would you agree that July 14th, 2015 is six
25	months or so past December 27th, 2014 and

January 26, 2015? 1 2 Α Yes. Okay. So would you also say that the provoking 3 event for you to go over to the courthouse here was 4 5 because you were receiving some anonymous text messages 6 that you found to be inappropriate or derogatory? 7 The provoking event was when he told me he Α No. 8 was listening to me have sex with somebody in my home. And when was that? When did that conversation 0 10 take place, 11 Α Sometime in June, I believe it was. 12 invited him over. 1.3 But you invited him over to your house after 14 these purported events took place in December of 2014 and 15 January of 2015; correct? 16 Α Correct. 17 So you were conveying to the court these two 18 particular events that caused you to be in fear for your 19 safety from Deputy Mandoyan, yet in June of 2015 you 2.0 invite him over to your house for a conversation; true? 21 Α True. 22 You didn't put in the restraining order Okav. 23 application that you invited Deputy Mandoyan to come over 24 to your house to have a discussion in June of 2015 in 2.5 regard to these text messages, did you?

1	A I don't know.
2	Q Well, would it be helpful if you reviewed your
3	document?
4	A Sure.
5	Q Okay. Before we get into a lot of time going
6	through everything on here, did you ever convey to the
7	court that you personally invited Deputy Mandoyan to your
8	residence to have a conversation?
9	A I don't know if I did. I believe that I put in
10	my restraining order that he admitted to me that he was
11	listening to me have sex with somebody else. I believe I
12	put that in that report.
13	MR. GOLDFEDER: All right. Motion to strike as
14	nonresponsive. Let me try to rephrase my question.
15	BY MR. GOLDFEDER:
16	Q Did you ever tell the court that you invited
17	Deputy Mandoyan over to your house in June of 2015?
18	A I don't recall if I did or didn't.
19	Q Okay. If you did not, do you think that's
20	something that should have been incorporated into your
21	restraining order application, you invited this gentleman
22	over to your house at the same time you're putting in
23	specific dates that caused you to have some kind of
24	apprehension as to Deputy Mandoyan?

25

Yes.

A

1	Q So is it fair to say, , that you
2	withheld information from your restraining order that
3	probably should have been submitted with it?
4	MS. ROAM: I'm going to object. That misstates
5	her testimony.
6	HEARING OFFICER SCULLY: Overruled.
7	THE WITNESS: Answer? Okay. So I put in my
8	restraining order for the most part what the lines allowed
9	me to put down.
10	BY MR. GOLDFEDER:
11	Q Well, there wasn't any restriction from you
12	writing down information as to having an invitation
13	meeting with Deputy Mandoyan.
14	A I agree with you on that.
15	Q Okay. And nobody prevented you from providing
16	that information in your restraining order application in
17	Superior Court; isn't that correct?
18	A Correct.
19	Q Okay. So then getting back to the text messages,
20	were you getting the bulk of these anonymous text messages
21	in June of 2015?
22	A I don't know. I don't have any idea what the
23	bulk was. I know that I had deleted quite a few messages
24	during that time frame.
25	Q And that's the time frame after you met with

1 Deputy Mandoyan. 2 Did he tell you he was not sending you these anonymous text messages? 3 4 Α Yes. 5 Did you have the El Segundo Police Department 6 serve Deputy Mandoyan with this restraining order? 7 El Segundo PD stood by while served 8 Deputy Mandoyan --So was that a "no," you did not have the El 10 Segundo Police Department serve Deputy Mandoyan? 11 Α No. 12 And were you present when Deputy Mandoyan was served with your restraining order? 13 14 I was present down the street. 15 Okay. And you indicated served Deputy Mandoyan with your restraining order while you sat 16 17 down the street and watched; is that correct? I didn't watch, no. I had no visual. 18 Α 19 But you said you were down the street. Q 2.0 Α I was down the street and around the corner, 21 which is where El Segundo told me to meet them. And then 22 they provided security with her to serve it. 23 Didn't El Segundo -- strike that. 24 How many interviews did you have with the 2.5 El Segundo Police Department?

1	A I'm sorry. What was the question?
2	Q How many interviews did you have with the
3	El Segundo Police Department regarding the report that you
4	made?
5	A I had the initial report and then I met with
6	detectives.
7	Q Would that be Detective and
8	Detective Danowitz?
9	A Yeah.
10	Q And when you met with Detective and
11	Danowitz, does it sound correct that that date would have
12	been, let's say, July 20th?
13	A Yeah.
14	Q Okay. And during at that interview, did
15	Detective and Danowitz indicate to you that they
16	would serve the restraining order on Deputy Mandoyan?
17	A I believe I remember reading the transcripts and
18	they said that they would.
19	Q Okay. And you elected instead to be down the
20	street and around the corner while served
21	Deputy Mandoyan; isn't that what actually happened?
22	A Yeah. That's what happened.
23	Q Okay. So you not did want to have the police
24	department serve Deputy Mandoyan, you wanted to be present
25	and have your friend do it instead?

1	A No. I don't remember the reason why I didn't
2	have them serve it. I don't recall the reason, but
3	Q But they offered to serve it; correct?
4	A Yes.
5	Q And you told them that you were going to have one
6	of your friends, , serve it instead; correct?
7	A Yes.
8	Q Were you aware that and
9	Deputy Mandoyan were in a dating relationship for a period
10	of time?
11	A At that point, yes.
12	Q When did that information come to your attention?
13	A In, I believe, June.
14	Q 2015?
15	A June or July. One of the two. Yeah.
16	Q Okay. So in and around the same time you had the
17	invited face-to-face meeting with Deputy Mandoyan in
18	June of 2015, that's around the time you were informed as
19	to his relationship with ; correct?
20	A Yes.
21	Q Okay. Now, after the restraining order was
22	served, did you ever contact Deputy Mandoyan along with
23	and tell Deputy Mandoyan:
24	"I told you I'd put a fucking case
25	on you. I told you. I told you I'd put a

1	fucking case on you"?
2	Did you ever say that to him?
3	A No.
4	Q Now, during your interview with
5	Detective Danowitz and they were asking you
6	questions regarding information you provided to
7	Officer Lemus who took the first report on July 14, 2015.
8	Do you remember talking to those detectives?
9	A Yes.
10	Q And them asking you questions about what you told
11	Officer Lemus?
12	A Yes.
13	Q And you were laughing quite frequently during
14	this interview, weren't you?
15	A Yes.
16	Q At one point during your laughter you stated:
17	"It's not going anywhere is it? It's
18	just for your purposes, because I'm cussing a
19	lot," laughing.
20	Do you remember telling them that?
21	A Yes.
22	Q And did you ever explain to them that you were
23	still in communication with text messages and other events
24	with Deputy Mandoyan when you were being interviewed by
25	these two detectives from El Segundo Police Department?

MS. ROAM: I am going to object. I believe that 1 2 misstates the evidence. Also, it's vague and ambiguous. HEARING OFFICER SCULLY: Well, overruled. I 3 mean, it may or may not misstate the evidence, but he's 4 5 asking a question so she can either agree with it or not. 6 THE WITNESS: I'm very certain that I told them 7 or Officer Lemus that I had invited him over to talk to 8 him about leaving me alone, and that's when he told me that he was listening to me have sex. And that's when I 10 told him to leave my house and that was the last time. 11 And I'm very certain that I told both of them that. 12 BY MR. GOLDFEDER: 1.3 Well, during this six-hour meeting that you had 14 with Sergeant Roam, did you ever review the initial 15 El Segundo Police Department [sic] that was filled out by Officer Lemus? 16 17 Α Yes. Okay. Did that refresh your recollection as to 18 19 what you told Officer Lemus? 2.0 Α Yes, it might have. 21 Did you ever tell Officer Lemus that after 22 reviewing this police report as part of your six hours of 23 preparation in this case that you invited Deputy Mandoyan 24 over to your house to ask him about text messages? 2.5 MS. ROAM: I'm just going to object. I didn't

1 understand the question. 2 HEARING OFFICER SCULLY: Can you repeat the question, please? 3 MR. GOLDFEDER: Certainly. 5 HEARING OFFICER SCULLY: No -- well, I meant the court reporter. 6 7 (The record was read by the court reporter.) HEARING OFFICER SCULLY: Sustained. 8 I don't 9 think that quite -- I think you're mixing up the timing, because I think the witness met with Sergeant Roam well 10 11 after the meeting with the officer. 12 MR. GOLDFEDER: Correct. But my question was 13 probably poorly phrased. 14 BY MR. GOLDFEDER: 15 So you had an opportunity to review all your interviews and your statements that you made to 16 17 Officer Lemus to the El Segundo Police Department when you met with Sergeant Roam for six hours sometime a couple --18 19 three months ago; correct? 2.0 Α Correct. 21 And in reviewing the El Segundo Police Department 22 report, did you ever see in there that you told that 23 initial officer, Marco Lemus, that you had invited Deputy Mandoyan over to your residence back in 24 2.5 June of 2015?

1	A I don't recall exactly what's in his report, but
2	I know that police officers don't take down a report and
3	write word for word from beginning to end what
4	their victims state, so it's more of a it's his report,
5	and whether or not he put everything that I told him into
6	it but I'm pretty positive also that I told IA during
7	the IA investigation portion that I invited him
8	MR. GOLDFEDER: Objection. Nonresponsive at this
9	point. It's going beyond the scope of the question.
10	BY MR. GOLDFEDER:
11	Q So when you reviewed the police report in the
12	presence of Sergeant Roam, your testimony here is that it
13	was incomplete?
14	A I didn't review the report in the presence of
15	Sergeant Roam. I reviewed it prior to meeting with her.
16	Q Okay. And you took your time and went over that
17	report?
18	A I wouldn't say took a lot of time, but I went
19	over it. To tell you what's in it
20	Q What did you tell detectives Danowitz and
21	that Marco Lemus wrote a great report with a lot of detail
22	in there?
23	Do you remember telling them that when you were
24	interviewed by them on the 20th of July, 2015?
25	A I recall them saying that he had a lot of detail

A I recall them saying that he had a lot of detail

and that he did a great job in dealing with me, and he 1 2 took his time at my house. I never read the report prior to meeting with 3 him, but he took his time listening to this lengthy series 4 5 of events. He was at my house, I think, two hours. 6 Now, you're saying he wrote an incomplete police 7 report; is that your testimony here? 8 I'm not saying that he wrote an incomplete police 9 report, but --So he wrote a complete police report? Yes or no? 10 11 MS. ROAM: I would just ask that Counsel allow 12 the witness to complete her answers. HEARING OFFICER SCULLY: Well, I think he's doing 13 14 that. I -- so objection noted, but --15 Can you answer that last question? THE WITNESS: Yes. If he didn't put in there 16 17 that I invited Caren over to my house to have that 18 conversation when I did tell him that, then he did write 19 an incomplete report. 2.0 HEARING OFFICER SCULLY: So you did tell him 21 that? 22 THE WITNESS: Yes. 23 HEARING OFFICER SCULLY: You told the officer 24 that --2.5 THE WITNESS: Yes. I have no shame in telling

that I did invite him over. I wanted to be -- I invited 1 2 him over --MR. GOLDFEDER: Motion to strike. No question 3 4 pending at this point. HEARING OFFICER SCULLY: What is the exhibit 5 6 number of the police report? 7 MS. ROAM: Department's Exhibit 6. 8 HEARING OFFICER SCULLY: Oh, 6. Thank you. 9 BY MR. GOLDFEDER: And you also told the detectives from 10 11 El Segundo Police Department that Deputy Mandoyan told you 12 not to go to briefings at the West Hollywood Station? 13 Α Yes. 14 Did you ever not go to briefings, ? 0 15 No. I believe I went to them. Α And that's part of your duties and job as a 16 Q 17 deputy sheriff; isn't that correct? 18 Α Yes. 19 If you could turn to Exhibit 5 in the big binder 2.0 in front of you, on page 4, I want to ask you a few 21 questions there. 22 Α Okay. 23 Now, if you could just read to yourself the -about the four or five lines where it starts off -- where 24 2.5 " just above the middle clip in the binder. it says "

It says "Good ol' Marco." 1 2 Α Yes. If you can read that to yourself, the three or 3 four lines. 4 5 HEARING OFFICER SCULLY: Sorry. What page is 6 that? 7 MR. GOLDFEDER: Page 4 of Exhibit 5. I'm sorry. 8 HEARING OFFICER SCULLY: Okav. 9 BY MR. GOLDFEDER: 10 Are you on page 4, 11 Α Yes. 12 Okay. Have you had a chance to review those four or five entries there? 1.3 14 Yeah. Do you want any briefing on that? No, it's fine. So this interview was taken -- I 15 believe it was July 20, 2015, so about six days after you 16 17 made your initial report to El Segundo Police Department. 18 Α Okay. 19 Did you have an appointment in advance to meet 2.0 with the El Segundo Detectives, or did you they contact 21 you? How did this meeting come about? 22 They contacted me and asked me to come in. 23 Okay. And at that time you had not had an 24 opportunity to review the police report written by 2.5 Officer Marco Lemus?

1	A No.
2	Q So you indicated to detectives actually
3	Detective Danowitz, you said:
4	"Good ol' Marco, he was a gent."
5	Are you referring to Marco Lemus who came out and
6	took the first report?
7	A Yeah.
8	Q And then the detective said:
9	"He took a very good report."
10	You responded:
11	"He was awesome."
12	A Uh-huh.
13	Q And Danowitz says:
14	"He did. He was good."
15	And then you respond back:
16	"He was so good, yes. He was so good."
17	A Uh-huh.
18	Q So you remember that discussion during your
19	interview back on July 20th, 2015?
20	A Yes.
21	Q But now, today you're telling us he wrote a
22	report that was incomplete?
23	MS. ROAM: I object. That misstates her
24	testimony.
25	HEARING OFFICER SCULLY: Overruled.

BY MR. GOLDFEDER: 1 2 "Yes" or "no" response. "Yes" or "no" to -- was -- he was good, yes, 3 but if he left that detail out --4 5 0 Thank you. 6 MR. GOLDFEDER: Motion to strike for everything 7 after "yes." HEARING OFFICER SCULLY: Well, I don't think 8 9 she's answered the question. The question is: Now you're 10 saying he wrote an incomplete report? That was the question, I believe. 11 12 MR. GOLDFEDER: Correct. BY MR. GOLDFEDER: 1.3 14 And your response was? 0 15 Α Yes. Okay. Thank you. So now, back in 2013 you 16 17 recorded a phone conversation with Deputy Mandoyan without 18 ever telling him you were recording a phone conversation; 19 do you remember that taking place? 2.0 Α Yes. 21 And the reason for that was, I believe, your 22 testimony was you felt trapped in 2013. 23 Does that help refresh your recollection as to 24 what you said in regard to your reasons for recording a 2.5 conversation without Deputy Mandoyan's consent?

1	А	Yes.
2	Q	And you weren't threatened at all with anything
3	in partio	cular back in 2013; is that correct?
4	А	Threatened with anything particular, like what?
5	Q	Well, you tell me. You were never threatened
6	with anyt	thing in particular back in 2013, but you recorded
7	a convers	sation with Deputy Mandoyan?
8	А	Yeah. He was threatening me all the time with, I
9	can put a	a case on you.
10	Q	Did you report this to any police agency?
11	А	No.
12	Q	Did you report this to anybody on the
13	Sheriff's	s Department?
14	А	No.
15	Q	Did you report this to ICIB?
16	А	No.
17	Q	Did you report that to Lieutenant Wiard?
18	А	No.
19	Q	So you didn't tell this to anybody?
20	А	I at the time, no.
21	Q	Okay. Did you ever tell Marco Lemus at
22	El Seguno	do Police Department that you have this phone
23	conversat	tion from 2013 that you recorded?
24	А	Yes.
25	Q	Okay. Did you ever explain to Deputy or
	1	

actually, Officer Lemus what your purpose was in recording 1 2 the conversation back in 2013? I might have. 3 Α So if that wasn't in his report, that was 4 5 something that he also omitted from the report? Would 6 that be your testimony? 7 Α I don't recall. Do you remember in your interview with 8 9 Detective Danowitz and Humphrey that you said your Department wasn't going to do shit about this? 10 11 Α Yes. 12 Q Now, you told them: "It's not going anywhere, is it? 1.3 14 It's just for your purposes? Because 15 I'm cussing lot." Was that something where you were just trying to 16 17 put a case on Deputy Mandoyan? 18 I cuss a lot, and I was asking them, because 19 they were recording the conversation, if it was just for 2.0 their purposes in relation to helping them file -- or 21 helping them write their report at a later time. That was 22 my reference to "this isn't going anywhere," because I 23 have a foul mouth. 24 HEARING OFFICER SCULLY: Are you referring to 2.5 Exhibit 5?

1	MR. GOLDFEDER: Yes.
2	HEARING OFFICER SCULLY: Okay. Was there a
3	particular page you were referring to that
4	MR. GOLDFEDER: Let me get the exact page here,
5	your Honor. I believe it's page 10. It's going to be
6	just above the middle of the three-clip binder.
7	It says:
8	: It's not going anywhere,
9	is it? Just for your purpose, because I'm
10	cussing a lot, laughing."
11	So Department's Exhibit 5, page 10.
12	HEARING OFFICER SCULLY: I see.
13	BY MR. GOLDFEDER:
14	Q And I'm moving on to so we have a page
15	reference here, same exhibit, Exhibit 5, page 12.
16	, at the bottom of the large paragraph
17	just between the second and third binder clip, very last
18	sentence, it says:
19	"I'm glad El Segundo is handling
20	this report because I don't trust my
21	agency for shit."
22	Do you remember telling that to
23	Detective Danowitz and Humphrey?
24	A Yes.
25	Q So you received another derogatory text message

on Father's Day, June -- or Father's Day weekend, 1 2 June 2015, and that's the reason you called up Deputy Mandoyan, to have this face-to-face at your 3 4 invitation over at your house? 5 Α Yes. And even after he told you he wasn't sending you 6 7 these messages, you indicated to him that: 8 "I've told you a thousand times, I'm 9 going to get this Department involved if you 10 don't stop. I've got enough on you, they're 11 going to relieve you of your duty. I'll have 12 your job. You've been allowed to keep your 1.3 job to my good grace." 14 Do you remember telling that to El Segundo in 15 relation to your conversation in June of 2015, face-to-face with Deputy Mandoyan? 16 17 Α Yes. 18 HEARING OFFICER SCULLY: What are you reading 19 from, Counsel? 2.0 MR. GOLDFEDER: I'm sorry, your Honor. The same 21 exhibit, Exhibit 5 on page 23. It's a great big, long 22 paragraph there. It's about two-thirds of the way down. 23 THE REPORTER: Can you please slow down when you 24 are reading, too? 2.5 MR. GOLDFEDER: Sure.

1	BY MR. GOLDFEDER:
2	Q And it also goes on in that same large paragraph
3	on page 23 of Exhibit 5:
4	"Because when I go to the Department
5	with everything that you've done, you're
6	going to get relieved, dude."
7	Do you remember telling that to Detective
8	on July 20th, 2015?
9	A Yes.
10	Q In that same interview, do you remember telling
11	Detective Danowitz and Humphrey that, quote:
12	"I don't know. I mean, he could very
13	well go with the, you know, trying to fix
14	my sliding glass door"?
15	Do you remember making that statement to the
16	detectives on July 20th, 2015, in your interview with
17	them?
18	A Yes.
19	Q And that same exhibit, Exhibit 5, your interview
20	with those detectives from El Segundo on page 33, do you
21	remember telling them that:
22	"You know, I don't give a shit. I
23	mean, I could care less about the text
24	messages at this point. It's not even
25	the text messages, they're just so irrelevant

1	compared to, like, the big scheme of things"?
2	Do you remember telling them that?
3	A Yeah.
4	Q Now, you also had a separate interview with
5	Internal Affairs, with , about these
6	events and incidents; correct?
7	A Yes.
8	Q You also told El Segundo Police Department, as
9	well as Internal Affairs, that at some point you claim
10	that Deputy Mandoyan came out to West Hollywood while you
11	were working in the field in a radio car and took your car
12	keys out of the radio car?
13	A Yes.
14	Q And then you typed to to have
15	him, you know, bring you an extra car key?
16	A Yeah. I asked him if he had an extra set.
17	Q And then you also texted him, and this was in
18	your interview with Internal Affairs, that:
19	"Yeah. I got my keys back."
20	You know, so he doesn't need to come to your
21	location.
22	Do you remember saying that to Internal Affairs
23	in your interview?
24	A No, I don't recall that. But I recall
25	didn't come back didn't come to my location with keys,

1 so I don't think that I ever typed back -- I 2 don't recall. So do you remember telling 3 during your IAB interview on June 24th, 2016, that you 4 5 about, you need a spare set of typed to keys, never told him why, but just asked him if he had an 6 7 extra set of patrol keys; do you remember that testimony? 8 Α Yes. 9 So you sent him the MDT text message? 10 Α Yes. 11 Did he ever respond to your location with the car 12 keys? 1.3 Α No. 14 And this was the incident occurring at some 15 parking lot off Melrose that I believe you testified to in your July 26, 2017 appearance here? 16 17 Α Yeah. Did Deputy Mandoyan ever have your Apple account 18 19 number and Apple password to access your cell phone? 2.0 Α I don't know -- yes, yes, he did. Yes, he did. 21 The Find My iPhone app was what he was able to access. 22 HEARING OFFICER SCULLY: I'm sorry. I didn't 23 hear that. 24 THE WITNESS: The Find My iPhone app was what he 2.5 was able to access.

1 HEARING OFFICER SCULLY: On your phone? 2 THE WITNESS: Yeah. Well, you can log in from 3 any computer to find it. 4 HEARING OFFICER SCULLY: So does that mean you 5 gave him your password? 6 THE WITNESS: I might have, yeah. It's possible. 7 HEARING OFFICER SCULLY: Well, is there any other 8 way he would have gotten it unless you had voluntarily given it to him? 10 THE WITNESS: I always use the same password, but 11 I'm sure I gave it to him. 12 HEARING OFFICER SCULLY: Okay. BY MR. GOLDFEDER: 1.3 14 When did you find out about the text message that 15 was received by I'm pretty sure it was immediately after. Her 16 17 significant other and I were driving back from working 18 overtime at Edelman Children's Court --19 And that would be Q 2.0 Α Yes. 21 Q 22 Correct. And she called him infuriated --Α 23 And that would have been June 3rd, 2015? Sounds 24 accurate? 2.5 Yeah. Α

1	Q The same day you called Deputy Mandoyan and said
2	whatever you testified to, to him on your prior
3	appearance?
4	A Yes.
5	Q Did you threaten his job on June 3rd, 2015?
6	A I don't know. It's possible. I was really mad.
7	Q And you were mad because this text message was
8	received by , the anonymous text,
9	and your conclusion was that it was sent by
10	Deputy Mandoyan?
11	A Yes.
12	Q So then you called him on June 3rd, 2015, and
13	expressed whatever sentiments you said during this
14	conversation?
15	A Yes.
16	Q Was Deputy Mandoyan at work when you called?
17	A I believe that he was, but I had no idea he was
18	at work when I called him, but I believe he was at work.
19	Q And you also indicated that during your interview
20	you were very heated and accused Mandoyan of sending text
21	messages to ; do you remember that interview?
22	A Yes.
23	Q Did you call Mandoyan a stupid motherfucker
24	during that phone conversation?
25	A Probably.

1 Did you call Deputy Mandoyan a base head during 2 that conversation? That sounds like something I would say. 3 4 Now, there was an occasion that you went to 0 5 Rock & Brew with 6 Α Yes. 7 Would that have been sometime during September of 0 2014? 8 Α Yes. And did you invite Deputy Mandoyan to come over 10 11 to Rock & Brew and have a beverage with you and 12 1.3 Α Yes. 14 MR. GOLDFEDER: I'm just about done, your Honor. 15 I just want to go through a couple of notes here. 16 HEARING OFFICER SCULLY: Okay. 17 (There was a brief pause in the proceedings.) 18 BY MR. GOLDFEDER: 19 Now, on January 26th, 2015, at this, you know, 2.0 0318, 0345 hour in the morning event, did you invite 21 Deputy Mandoyan to come to your residence? 22 Α No. 23 So when he showed up at your residence after this 24 26-minute phone call, was he on the -- were you both on 2.5 the freeway when that phone call was being made?

1 Α Yes. 2 Okay. So when he showed up at your house, that was something you weren't expecting? 3 4 Α No. 5 Did you contact the police when he showed up at 6 your house? 7 Α No. 8 MR. GOLDFEDER: No further questions, your Honor. 9 MS. ROAM: Can we take a short break to use the 10 restroom? 11 HEARING OFFICER SCULLY: Yeah. Let's do that. 12 Off the record. 1.3 (A recess was taken.) 14 HEARING OFFICER SCULLY: Okay. Back on the 15 record. All right. Mr. Goldfeder, you're finished with cross? 16 17 MR. GOLDFEDER: That's correct, your Honor. 18 HEARING OFFICER SCULLY: I just have one 19 question, something that I noticed, which is the police 2.0 report. You say you noted that -- or you reported anyway, 21 that on 12/27/14 is when Mandoyan took the screen off and 22 tried to come in the -- open the window, and then used the 23 broom handle to open the rear sliding door, but was 24 unsuccessful. 2.5 That was on 12/27/14; right?

1	THE WITNESS: I don't know what the exact dates
2	were that I gave him.
3	HEARING OFFICER SCULLY: Do you want to look at
4	the report? You can look at Exhibit 6, page 4. That
5	looks like, probably, page 5.
6	MS. ROAM: It's going to be Bates-stamped in the
7	bottom corner.
8	HEARING OFFICER SCULLY: Oh. I'm sorry. I'm
9	looking at
10	THE WITNESS: Okay. There it is.
11	HEARING OFFICER SCULLY: All right. Anyway, the
12	police report says that you reported that incident on
13	12/27/14; right?
14	THE WITNESS: Yes. That's what it says.
15	HEARING OFFICER SCULLY: Okay, but if you look at
16	Exhibit 56
17	THE WITNESS: I was still talking to him.
18	HEARING OFFICER SCULLY: Well, do you have 56?
19	THE WITNESS: Right here.
20	HEARING OFFICER SCULLY: Okay. So on 12/27 at
21	almost midnight, he texts you and says:
22	"What you doing, babe?"
23	And then says:
24	"I love you"; right?
25	THE WITNESS: Yes.

1	HEARING OFFICER SCULLY: So it was after this
2	little incident here that you described to the police?
3	THE WITNESS: It could have very well been. Like
4	I have mentioned before, it's always been volatile. We
5	break up it's been we officially broke up in
6	December. We never really got back together after that,
7	but we would break up, get back together, break up, get
8	back together. So whether
9	HEARING OFFICER SCULLY: Okay. So, just confirm
10	on 12/28 that just about just short of 1:00 a.m. he
11	texted you, said:
12	"I love you," and you texted him back:
13	"I love you," with an exclamation point.
14	THE WITNESS: Right. Like I said, I approximated
15	all my dates when it came down to the specific dates so
16	whether or not
17	HEARING OFFICER SCULLY: So what you're saying is
18	when you made a reported a date to the police, whether
19	it's El Segundo police or even in the IAB, those are all
20	approximate dates; is that what you're saying?
21	THE WITNESS: For the most part, everything has
22	been approximated, yeah.
23	HEARING OFFICER SCULLY: Okay. So reading the
24	report, when it says that you said it happened on
25	12/27/14, the reader shouldn't necessarily take that

1 seriously because you're telling us those dates are only 2 approximate? 3 THE WITNESS: Yes. HEARING OFFICER SCULLY: Okay. Any other -- what 4 5 else in the reports is approximate? 6 THE WITNESS: Like, I approximated the domestic 7 violence portion. I approximated it in September. 8 when all this happened, again, when I made the report, it was months -- you know, if the domestic violence happened 10 in September of '14 and I made this police report in July, I didn't have exact dates. I approximated, for the most 11 12 part, all of my dates. HEARING OFFICER SCULLY: Okay. So you also -- I 1.3 14 see on the 28th at 1:43 in the morning you said again: "I love you." 15 THE WITNESS: Yeah. I see that. I very well 16 17 could have said, I love you, after this happened. Just 18 like I went back to him and said, I love you, after 19 September when the domestic violence happened. So that's 2.0 not unlike me to still say, I love you, to him. 21 HEARING OFFICER SCULLY: Okay. Well, all right. 22 That's all I have. 2.3 Sergeant Roam, did you have anymore direct? 24 MS. ROAM: I have some redirect, if I might. 2.5 HEARING OFFICER SCULLY: Okav.

1 REDIRECT EXAMINATION 2 BY MS. ROAM: , let's start with this last 3 Q Okay. So part. You said it was not unlike you to say, I love you, 4 5 even after the domestic violence, and you're not sure if 6 this text message was after the balcony screen -- or 7 sliding glass door incident or not, but let me ask you: 8 Why? Why would you continue to tell him you love 9 him after these things are happening? MR. GOLDFEDER: Objection. There's no basis or 10 11 foundation of fact for any domestic violence here, and the 12 use of that term in the light of no filing with the 1.3 District Attorney is inappropriate. 14 HEARING OFFICER SCULLY: What is meant by the 15 term "domestic violence"? MS. ROAM: Can I withdraw and just re-ask? 16 17 HEARING OFFICER SCULLY: Sure. BY MS. ROAM: 18 19 , you said in September of 2014 there 2.0 was an incident where the Appellant grabbed you, strangled you; do you recall that? 21 22 Α Yes. 23 Okay. And is it your testimony that after that 24 incident you continued to tell him that you loved him? 2.5 Α Yes.

1	Q Okay. Can you tell me why?
2	A Because I did.
3	Q Okay. And you also, in response to Mr. Scully's
4	questions now, said that it would not be unlike you to
5	tell him that you loved him, even after this incident on
6	your balcony where he attempted to get into your sliding
7	glass door.
8	MR. GOLDFEDER: Objection. Leading.
9	HEARING OFFICER SCULLY: Sustained.
10	MS. ROAM: I wasn't finished with the question.
11	I think generally I should be permitted to finish the
12	question before he makes an objection.
13	HEARING OFFICER SCULLY: All right. Try it.
14	BY MS. ROAM:
15	Q All right. , after this December
16	incident where we have video of the Appellant attempting
17	to get into your sliding glass door, in response to
18	Mr. Scully's question, you said it would not be unlike you
19	to continue to say that you love the Appellant.
20	Again, can you tell us why?
21	MR. GOLDFEDER: Again, it's leading. Calls for a
22	conclusion.
23	HEARING OFFICER SCULLY: Well, I have to agree.
24	It's because it's it calls for conclusion and also
25	perhaps an argument as to why she did a certain thing. I

mean, I think what's important is those words were spoken.

I mean, if you have any kind of other facts that

you want to bring out, you're free to do that and make your argument as to the significance of those facts, but to -- I think to allow the witness to essentially make an argument as to why she felt a certain way, I don't think is -- I don't think it's the type of percipient witness testimony that should be permitted, because it's more her own subjective narrative as to why she's right.

MS. ROAM: I'm asking her to explain why she took a particular action that is being questioned, to put it in context.

HEARING OFFICER SCULLY: I think you're asking her to explain why she still loved him. That's how I took it. Because otherwise, the testimony is, yeah, she said, I love you, and I think you asked her why, and she said, Because I did.

And now you're asking to analyze psychologically why did you still love him, even though certain events happened that would suggest that there's -- should be maybe a different relationship.

MS. ROAM: Okay.

BY MS. ROAM:

1.3

2.0

2.5

Q I'm going to turn your attention, , to Appellant's Exhibit 58, the phone log, and prior to your

testimony this morning, had you seen this? 1 2 It looks like a page from a Verizon Wireless bill. 3 Α No. 5 All right. And after Counsel asked you some questions, does it refresh your recollection as to when 6 these events would have occurred? 7 8 Α Yes. And I believe you testified on cross-examination 10 that these phone calls all took place on the same day that 11 the Appellant attempted to get into your bathroom window; 12 correct? 1.3 Α Yes. 14 Now, is your memory now -- I believe you also 15 answered that you are quite certain now what it was you were talking about for those 26 minutes? 16 17 Α Yes. 18 Can you tell us what you were talking about? 19 I was basically just telling him, you know, let 2.0 me move on with my life, you know. This relationship has 21 gone nowhere, it's not going anywhere, and let me move on 22 with my life. You need to move on with yours, and there's 23 nothing to talk about. 24 Okay. And there are a number of calls between

3:14 a.m. and it appears 11:56 a.m., but most specifically

2.5

concentrated between 3:14 a.m. and 4:13 a.m. 1 2 Do you see all those calls involving your number? 3 Α Yes. Do you know who was calling who? 4 5 Yes. He was calling me. Α 6 How many times did you call him? 0 7 I called him the one time. Α 8 Okay. All right. I want to turn your attention 0 9 to Department's Exhibit 6, and on cross-examination Counsel asked if you told El Segundo Officers that you had 10 11 invited the Appellant over to your house in June; do you 12 recall those questions? 1.3 Α Yes. 14 I want to turn your attention to page 4, which is 15 Bates-stamped in the bottom right-hand corner. This appears to be the El Segundo Police report of Marco Lemus 16 17 on July 17, 2015, and I want to turn your attention to the 18 third paragraph from the bottom. If you would read that and see if that --19 2.0 Α Do you want me to read it out loud? 21 0 No, no. Just read it to yourself. 22 Α Okav. 23 Counsel asked you that if the officer did not 24 include that information you relayed to him, would this report have been incomplete. 2.5

1 Do you remember him asking you that? 2 Α Yes. Did Officer Lemus include the information that 3 0 you told him in his report? 4 5 Α Yes. 6 And then when you met with detectives on 7 September 2nd, if you would turn in the same exhibit to page 9, you testified that you also detailed this contact 8 with Mandoyan on June the 21st in your interview with 10 Detective Danowitz; is that correct? 11 Α Correct. 12 And if you would look at the third from the 1.3 bottom paragraph on page 9, and just read it to yourself. 14 Α Okay. 15 Does it appear that Detective Danowitz included 16 that information in his report? 17 Α Yes. 18 And then we also know that this interview was 19 digitally recorded that you had with Detective Danowitz; is that correct? 2.0 21 Α Yes. 22 And, again, turn to Departments Exhibit 5, 23 page 22 -- hold on. I think I have the wrong page. Oh, 24 I'm sorry. Okay. I'm sorry. It's actually page 23. And 2.5 there's a super long paragraph narrative on that page.

1 If you would just take a moment and take a look 2 at that. 3 Α Okay. Okay. And was this regarding this June 21st 4 0 5 meeting that you had with the Appellant? 6 Α Yes. 7 All right. Now, you relayed to the detectives 0 8 conversations you had with the Appellant. Specifically, you were asked on cross-examination if you told them that 10 you were going to get the Department involved and that you 11 would have his job. 12 Did you tell the Appellant those things? 1.3 Α Yes. 14 Why? 0 15 So he would leave me alone. This Department -his job was his world, and I thought that would be the 16 17 only thing that would get through to him to leave me 18 alone. 19 Were you threatening to put a false allegation on 2.0 him? 21 Α No. 22 So what were you threatening? 23 I was threatening that if he didn't leave me alone, all these things that he's done -- if he wouldn't 24 2.5 leave me alone, then I was going to have to go to the

1	Department with it.
2	Q Now, also during this interview with
3	Detective Danowitz, you told him that you were glad
4	El Segundo was handling the report; is that correct?
5	A Yes.
6	Q And you said that you did not trust your agency;
7	is that correct?
8	A Correct.
9	Q Why did you not trust the Sheriff's Department to
10	handle this?
11	A Because he always said that he had friends in
12	high places and he was untouchable. So I didn't trust
13	that it was going to get taken care of appropriately.
14	Q And during the same interview let me take a
15	look, real quick.
16	Counsel asked you about the statement you made to
17	Detective Danowitz, that you could care less about the
18	text messages at this point.
19	"It's not even the text messages.
20	They're irrelevant compared to, like,
21	the big scheme of things."
22	Do you remember him asking you about that?
23	A Yeah.
24	Q What did you mean by "the big scheme of things"?
25	A Him following me on dates, him sitting outside my

house when I think he did, when he was listening to me 1 2 have sex with somebody else, those are the big scheme of things, where you're interfering with my life and me 3 moving on. That's the bigger things. 4 5 Okay. But I believe on cross-examination you 6 also testified that these text messages were kind of a 7 trigger for you to meet with the Appellant and have this 8 conversation and ultimately report to the Department; is that correct? 10 Yes. 11 But you don't know that he was the one that was 12 sending you these text messages? 1.3 Α Correct. 14 But you believed that he was? 0 15 Correct. Α Why do you believe he sent you the text messages? 16 Because nobody -- in my opinion, no one cares 17 what I do with my life. Like, I don't -- that's my 18 19 opinion. No one takes that kind of time. 2.0 Q Okay. Now, , did you file a report 21 with El Segundo Police Department because you were 22 iealous? 23 Α No. 24 Were you upset that was dating 2.5 Caren Mandoyan?

1		A	No.	
2		Q	Did you at some point learn that	
3	was dating Caren Mandoyan?			
4		A	Yes.	
5		Q	How did you feel about that?	
6		A	I didn't feel anything about that.	
7		Q	Okay. And you also testified that at some point	
8	you o	chang	ged your phone?	
9		A	Yes.	
10		Q	Remind us, when did you change your phone number?	
11		A	Maybe, like, February or March.	
12		Q	And when did you begin receiving all of these	
13	anonymous text messages, after you changed your phone			
14	in relationship to when you changed your phone?			
15		A	I don't know. Shortly after.	
16		Q	How long over what period of time did you	
17	recei	ive t	these harassing anonymous text messages?	
18		А	I believe a couple of months.	
19		Q	Now, you when you confronted Caren Mandoyan on	
20	June	the	21st about these text messages, what did he tell	
21	you?			
22		A	He said that he wasn't the one sending them.	
23		Q	Did he tell you that he knew who was sending	
24	them?	?		
25		А	No.	

1 I want to turn to the restraining order 2 application. It's going to be Department's Exhibit 21, and I'm looking at page 5. 3 The little numbers written at the bottom? 5 Yeah. Now, on cross-examination, Counsel asked 6 when you applied for this restraining order if you 7 included information about your ongoing communication with 8 Caren Mandoyan after he attempted entry into your apartment. 10 Do you recall those questions on 11 cross-examination? 12 Α Yes. 1.3 And why did you not include your ongoing 14 communications with him in this application for a 15 temporary restraining order? Because it's limited space, and I felt that 16 17 eventually we would meet in front of the judge and I could 18 get it all out, but -- it's very limited space. It's for 19 a TRO. It's not everything. 2.0 Q Okay. In fact, in your application for a TRO, 21 did you even mention the incident of him attempting to 22 enter your apartment? 2.3 Α I don't --24 Do you want to take a look at page 5 and see if 2.5 that refreshes your recollection?

1	A Yeah. Okay.
2	Q So what incident were you reporting to support
3	your request for a temporary restraining order?
4	A That he had followed me while I was out to dinner
5	with someone, and the incident where he was listening to
6	me have sex with somebody in my apartment.
7	Q That information, or those incidents occurred
8	when?
9	A Prior to him coming over. Prior to me meeting
10	with him, inviting him over in June.
11	Q Okay.
12	HEARING OFFICER SCULLY: There was a on the
13	restraining order there is a box that's below the text
14	that you hand-wrote. It says:
15	"Check here if you need more space.
16	Attach a sheet of paper."
17	And it's checked, but I didn't find any
18	attachment.
19	Do you know if you attached a sheet with extra
20	narrative of your allegations?
21	THE WITNESS: I don't know if I did. I don't
22	remember.
23	HEARING OFFICER SCULLY: Okay. Well, does either
24	counsel have any extra narrative as part of the
25	restraining order?

1	MS. ROAM: This is all I have.
2	MR. GOLDFEDER: Yes, your Honor. I was going to
3	bring this up. I was going to see if the Department's
4	advocate was going to get into that section.
5	These are the two additional pages which are
6	missing from their exhibit, which is
7	Department's Exhibit 21. I don't know if you want to make
8	copies of it. I have another set here.
9	HEARING OFFICER SCULLY: Okay.
10	MR. GOLDFEDER: Those were part of the original
11	court filing that were omitted in Department's Exhibit 21.
12	HEARING OFFICER SCULLY: Should we make those
13	Exhibit 59 or what are we on now, is it 60?
14	MS. ROAM: We can mark it as
15	Department's Exhibit next in order, which would be
16	MR. GOLDFEDER: Why don't we just make it
17	MS. ROAM: 32.
18	MR. GOLDFEDER: for continuity, a
19	Defense Exhibit, which I believe next in order would be
20	60.
21	MS. ROAM: It makes no difference to me if it's a
22	Department's Exhibit or Appellant's Exhibit.
23	HEARING OFFICER SCULLY: No. It all gets
24	subjected to the same scrutiny, so it doesn't matter.
25	Only because Mr. Goldfeder offered it, that would be my

inclination to say it's Exhibit 60.
(Appellant's Exhibit 60 was marked for
identification by the Hearing Officer.)
MS. ROAM: Okay.
HEARING OFFICER SCULLY: But, you're absolutely
right. I will consider it in relation to Exhibit 21.
MS. ROAM: We'll have copies of that made before
we're finished here, so everyone can have it.
HEARING OFFICER SCULLY: Is that all right with
you, Mr. Goldfeder?
MR. GOLDFEDER: Certainly. I appreciate the
courtesy.
(There was an interruption in the proceedings.)
HEARING OFFICER SCULLY: So let's go for it.
We're still on. Next question.
BY MS. ROAM:
Q So on cross-examination, Counsel asked if the
reason you made the police report is because you were
directed to by the Department; do you remember those
questions?
A Yes.
Q And, in fact, the information you provided for
the report, did the Department tell you to say those
things?
A No.

1	Q Why did you report that information?
2	A Because it all happened.
3	Q Okay. And did you relate this information to the
4	Department?
5	A I believe I did, yeah.
6	Q Okay. And I believe Counsel on cross-examination
7	also asked if after January the 26th the Appellant ever
8	came back over to your apartment.
9	Do you remember him asking you about that?
10	A Yes.
11	Q And, in fact, were you made aware that the
12	Appellant did come to your apartment?
13	A Yes.
14	MR. GOLDFEDER: Objection. Lacks foundation at
15	this point.
16	HEARING OFFICER SCULLY: Well, there has been
17	testimony that she invited him over and he did come over
18	around the 21st of June, so I'm assuming that's what
19	you're referring to.
20	MS. ROAM: That's not, but
21	HEARING OFFICER SCULLY: Because there's no
22	other I don't recall any other testimony that he came
23	over.
24	BY MS. ROAM:
25	Q Okay. Were there any other times when the

Appellant came over to your apartment besides June the 1 2 21st, after the January 26th incident? 3 Α Yes. Please tell us about that. 4 5 I was at home. I had a quest over. We were watching a ball game, and my cat started freaking out at 6 7 the door -- the screen door, so I opened the door looked 8 outside, I didn't see anything. So then the following day at work I got a phone call from a mutual friend of ours, 10 , and she said --11 MR. GOLDFEDER: Objection. Multiple hearsay. 12 Lack of foundation at this point. HEARING OFFICER SCULLY: Overruled. 13 14 THE WITNESS: She told me, you know, Caren called 15 He's freaking out. He came to your house yesterday, you saw him. He doesn't want you to go to the Department. 16 17 He was really upset. He found out that his mom has cancer 18 and he had nobody else to go to so he came to your house. BY MS. ROAM: 19 2.0 Okay. Did you actually see him that night? 21 I didn't have my glasses on. 22 HEARING OFFICER SCULLY: Did you ever ask him 23 later if he had come over? 24 THE WITNESS: No, I didn't. 2.5 HEARING OFFICER SCULLY: So you don't know for

1 sure if he came over or not? 2 THE WITNESS: No. I just took , who was a good friend of his, word for it. 3 HEARING OFFICER SCULLY: Do you have any other 4 5 information that he came over anytime between January and 6 June, other than what you already described? 7 THE WITNESS: No. Nothing. 8 HEARING OFFICER SCULLY: All right. 9 BY MS. ROAM: Okay. I'm going to turn your attention to 10 11 Appellant's Exhibit 55, it's a one-page text message 12 screenshot, just one page, should be at the very bottom. Starts with "don't worry about it." 13 14 Α Yes. 15 Now, you were asked about these messages on cross-examination. 16 17 , do you know the context of this 18 conversation? 19 Α No. 2.0 Do you have any idea what happened -- what was 21 said before or after? 22 No. I don't remember this conversation. 23 Is this consistent with the types of 24 conversations you would have, or text message 2.5 correspondences you would have with the Appellant?

1	A Yeah.
2	Q Okay. Now, also on cross-examination, Counsel
3	asked if Appellant had told you that you were not allowed
4	to talk to your cousin, ; do you recall those
5	questions?
6	A Yes.
7	Q How many times would you estimate the Appellant
8	had told you something to the effect that you can't talk
9	to ?
10	A A few.
11	Q Did he ever tell you there were other people you
12	could not talk to?
13	A Yes.
14	Q Who?
15	A People that I worked with.
16	Q Anyone else?
17	A Not that I can recall.
18	Q How often would these conversations happen?
19	A I don't know.
20	Q Over the course of your two-year dating
21	relationship, was it once or twice? Can you give us some
22	kind of an estimate?
23	MR. GOLDFEDER: Objection. Already been asked
24	and answered, says she doesn't remember.
25	HEARING OFFICER SCULLY: Overruled.

1 Can you answer? 2 THE WITNESS: I mean, a few times. I don't have an approximate whether it was five or ten. Just a few 3 4 times. HEARING OFFICER SCULLY: A few times what? 5 THE WITNESS: A handful of times. 6 7 HEARING OFFICER SCULLY: A handful of times what? 8 What happened a handful of times? THE WITNESS: That he would get mad and tell me I 10 couldn't talk to people. I couldn't talk to my partners. 11 Don't talk to anybody at the station. Don't talk to your 12 cousin. 1.3 Whenever I would be on the phone with my cousin 14 and didn't click over to talk to him, he would get 15 upset about it. Just a handful of times. I don't have a specific --16 17 HEARING OFFICER SCULLY: What was your response 18 when he told you that? 19 THE WITNESS: He had no -- my response usually 2.0 was, I'm going to talk to my cousin, she's my family. 21 HEARING OFFICER SCULLY: So you let him know that 22 you're not going to pay attention to his instructions, and 23 if you want to talk to your cousin you're going to do it? 24 THE WITNESS: Right. 2.5 HEARING OFFICER SCULLY: So he wasn't able to

1	control your behavior in that way?
2	THE WITNESS: Right.
3	BY MS. ROAM:
4	Q So did he control your behavior in any way?
5	A I mean, at work I wouldn't talk to my partners.
6	You know, if it was something work related and I had to, I
7	would keep it very minimal, but for the most part, while I
8	was at work, I was very aloof because I didn't want
9	problems with him.
10	Q Now, you also testified on cross-examination that
11	has brought you to and from our
12	hearing.
13	Why is that?
14	A Because I wanted him to take me.
15	Q And why?
16	A So that we wouldn't run into each other in the
17	parking lot.
18	Q And when you say "we wouldn't run into each
19	other," what do you mean?
20	A Caren and I.
21	MS. ROAM: All right. I have no further
22	questions.
23	HEARING OFFICER SCULLY: Okay. Any recross,
24	Mr. Goldfeder?
25	MR. GOLDFEDER: Just briefly.

1 RECROSS-EXAMINATION 2 BY MR. GOLDFEDER: 3 You never said anything about this scenario with a guest over on an occasion sometime after June 21st, 4 5 2015, to El Segundo Patrol Officer Marco Lemus, did you? 6 Α No. 7 Did you say that to El Segundo Detectives 0 8 Danowitz and Humphrey? I don't believe I did. How about in your first IAB interview with 10 11 , did you bring this up to him? 12 I'm not sure if I did or not. Α 13 Q How about the second interview? Did you ever 14 bring it up to in that interview? 15 Α No. 16 So was this something that you're just telling us 17 for the first time here today? 18 It possibly could be the first time, yes. 19 Okay. And I believe a comment was asked of you, 2.0 as far as a false allegation. 21 Do you remember Sergeant Roam asking you about 22 that? 23 Α Yes. 24 Do you know a Long Beach Detective named 2.5 Jennings?

1	A	Yes.
2	Q	Do you also know and ?
3	А	Yes.
4	Q	Did you make a false allegation against them back
5	in 2013?	\mathcal{E}
6	А	No.
7	Q	Did you make a report to the Long Beach Police
8	Departme	ent to Detective Jennings?
9	А	Yes.
10	Q	Was that after you were informed, or you heard
11	that	and were talking about having
12	group se	ex with you?
13	А	No.
14	Q	So you're familiar with making police reports to
15	outside	agencies?
16	A	Yes.
17		MR. GOLDFEDER: Nothing further.
18		HEARING OFFICER SCULLY: Okay.
19		MS. ROAM: I'm done.
20		HEARING OFFICER SCULLY: All right. Well,
21		, that concludes your testimony. Thank you for
22	coming i	n.
23		We're going we have another witness, that's
24	Officer	or ?
25		MS. ROAM: That's Counsel's witness.

1	HEARING OFFICER SCULLY: Oh, this is a defense
2	Appellant's witness?
3	MR. GOLDFEDER: Yes.
4	HEARING OFFICER SCULLY: Okay. Let's take our
5	afternoon break now then, and we'll start with
6	then.
7	15 minutes, so about 13 after.
8	(A recess was taken.)
9	HEARING OFFICER SCULLY: All right. Let's go
10	back on the record, and we have an another witness let
11	me check something. Okay.
12	So raise your right hand, sir.
13	
14	,
15	produced as a witness by and on behalf of the Appellant
16	and having been first duly sworn by the Hearing Officer,
17	was examined and testified as follows:
18	
19	HEARING OFFICER SCULLY: All right. Thank you.
20	State and spell your name, please, for the court reporter.
21	THE WITNESS:
22	•
23	HEARING OFFICER SCULLY: Okay. Thank you.
24	Mr. Goldfeder?
25	MR. GOLDFEDER: Thank you, your Honor.

1 DIRECT EXAMINATION 2 BY MR. GOLDFEDER: 3 Is it ? Α It is, sir. 4 5 If you could tell us your hire date and a brief 6 summary of your Departmental experience through today? 7 My hire date was February 11th, 2002. After the 8 Academy I went to NCCF and I was there for three years. I left as a Building Supervisor, Senior Deputy. From there 10 I went to Century to train, I was there for a year. After 11 that I went to TSB, I was there for a year. After that I 12 went to West Hollywood, I was there for approximately three years. From there I left and went to COPS. While 13 14 at COPS, I was stationed at Palmdale, Lancaster, and 15 East Los Angeles. I then went back to a Training Officer position at West Hollywood. I'm currently at 16 17 Civil Lit Risk Management. 18 THE REPORTER: I'm sorry. Can you repeat that last one? 19 2.0 THE WITNESS: I'm currently at Civil Litigation 21 Unit, Risk Management. 22 BY MR. GOLDFEDER: 2.3 Do you know Deputy Caren Mandoyan? 24 Α I do. 2.5 And how do you know Deputy Mandoyan? Q

1	А	We worked together at West Hollywood.
2	Q	Do you know ?
3	А	I do.
4	Q	Did you work with her at West Hollywood?
5	А	I did.
6	Q	Now, were you working West Hollywood in 2013,
7	2014?	
8	А	Yes.
9	Q	Was that during the time period that
10	Deputy Ma	andoyan was at West Hollywood Station?
11	А	I believe so.
12	Q	At some point in time when you were at
13	West Holl	lywood Station, did Deputy Mandoyan transfer out
14	to anothe	er station?
15	А	Yes.
16	Q	What is your relationship with Deputy Mandoyan?
17	А	We're friends.
18	Q	Okay. I mean, work friends, outside work
19	friends?	
20	А	Casual friends. We don't really hang out outside
21	of work.	
22	Q	All right. So at some point in time when you
23	were at t	the West Holly Station, were you working a king
24	car by yo	ourself, handling calls for service, things of
25	that natu	are?

1	A Yes.
2	Q Did you ever work the field or the same shift
3	with ?
4	A Yes, I believe so.
5	Q Do you remember at any point in time when you
6	were on this what shift did you work at
7	West Hollywood Station with ?
8	A I was on early mornings. I would do p.m. shift
9	overtime, which I think was her shift.
10	Q Okay. So you were mostly working overtime on her
11	shifts, which would be p.m.'s?
12	A Yes.
13	Q Do you have any estimates as to how many times
14	you were working p.m. shift for overtime or any other
15	reason when was working during the time you
16	were at West Hollywood Station?
17	A Honestly, I couldn't tell you. We didn't really
18	run the same circle, so
19	Q So short of being dispatched to call and assist
20	along with , you really didn't have much
21	interaction with her?
22	A Correct.
23	Q Were you ever contacted or, strike that. Let
24	me do this first.
25	In your patrol vehicle are you capable of sending

messages to other deputy sheriffs working your shift over 1 2 at West Hollywood Station? Yes. Through the MDC. 3 THE REPORTER: I'm sorry. Through the --4 5 THE WITNESS: MDC. I'm sorry. 6 BY MR. GOLDFEDER: 7 And MDC is a mobile digital computer? 8 Α Yes. 9 You've received messages and sent messages to 10 other deputy sheriffs during the time when you worked 11 patrol? 12 Α Yes. 13 Did you ever receive a message from 14 at any point in time when you were working in the field at West Hollywood Station asking you for an extra set of car 15 keys? 16 17 I don't remember that ever happening. 18 If that had happened was that something you would have remembered? 19 2.0 Α Probably, yes. 21 Have you ever seen Deputy Mandoyan at 22 West Hollywood Station after he transferred to 2.3 South Station? 24 Α Yes. 2.5 Could you tell us what those occasions would have

been?

2.0

2.5

A He would come out. He came out and ate with me a couple of times. He would come and visit people at the station, but that's kind of the person he was. He would get off at 2:00 in the morning and stay there until 6:00 a.m. when I got off and was still talking to the Watch Sergeant, and, you know, one of those people that the Department is kind of his life. Sorry.

Q Is Deputy Mandoyan the kind of deputy that goes out of his way to help other deputies better themselves in their career?

A Very much so. Actually, he helped me out a lot in the shooting I was involved in.

Q Would you say he put himself out there as a, you know, mentor to other deputy sheriffs?

A Yes. As a matter of fact, even after he went to South LA, when I'd come across something narcotics-wise that I had never encountered before, I would contact him on cell phone. A lot of people would, actually, at the station.

Q He's considered among other deputy sheriffs to be a resource or someone they could reach out to if they had a question about something?

A Yes.

Q And were you interviewed by Internal Affairs in

relation to this particular case? 1 2 Α Yes. Were you asked by Internal Affairs about this 3 situation whether Caren Mandoyan ever went out while 4 5 was on duty and took her car keys from her patrol vehicle? 6 7 Yeah. I never heard anything about that. Α 8 Okay. And you never received an MDC text message 9 in regard to any extra set of car keys from any time you were working at West Hollywood Station? 10 11 Α No. 12 When you first heard about that allegation, as 13 far as Caren Mandoyan purportedly taking car keys from a 14 deputy sheriff on duty, what did you think when you first 15 heard that information? First time I heard it was actually from 16 17 Internal Affairs, and I didn't really put any weight 18 behind it. It didn't seem like his character. 19 And how would you describe Deputy Mandoyan's 2.0 character based on the time you interacted with him as a 21 deputy sheriff out in the field or at West Hollywood 22 Station? 23 Just very professional, never do anything to 24 disrespect the uniform or the badge. He held it in very 2.5 high regard.

1	Q So when you first heard this allegation about
2	removing car keys from a deputy sheriff who was actually
3	working in the field, did that strike you as being
4	something that you found to be an incredible story or
5	statement?
6	A Yes. Especially since every deputy I've ever
7	worked with carried an extra set of car keys in their
8	Bail Out Bag.
9	Q Let's say a deputy sheriff doesn't have extra car
10	keys in their Bail Out Bag. Based upon your interaction
11	with Deputy Mandoyan, would you expect that he would go
12	out there and put any patrol deputy in harm's way by
13	removing their ability to drive around or function as a
14	deputy sheriff?
15	A Not for one second.
16	MR. GOLDFEDER: I have no further questions.
17	HEARING OFFICER SCULLY: Okay. Thank you.
18	Any cross-exam?
19	MS. ROAM: Yes, briefly.
20	
21	<u>CROSS-EXAMINATION</u>
22	BY MS. ROAM:
23	Q , did you have occasion to see
24	the Appellant, Caren Mandoyan, interact with
25	?

We had a meal once. I can't remember if she was 1 2 in training or not, but she sat in Urth Caffe with us. And other than that one time that you shared a 3 meal -- do you know when that occurred? 5 Honestly, I don't remember. Probably would have 6 been right when I got back to the station, late '13 early 7 '14, if I had to guess. 8 And I believe you said that during the earlier 9 part of your testimony that you worked a king car. What is a king car? 10 11 Actually, he said I worked a king car. 12 single-man car. 13 And you testified to your assessment of the 14 Appellant's character based on your experience with him; 15 is that correct? 16 Α Yes. 17 Do you know what the allegations in this case 18 are? Some of them. 19 Α 2.0 Q What do you know? 21 That there was a phone taken and that keys were 22 taken and some allegation of domestic violence, but I 23 don't have the whole story. 24 Did the Appellant ever tell you why he was 2.5 discharged from the Department?

We didn't have an in-depth conversation about it, 1 Α 2 no. So tell me about the conversation you had with 3 Q him. 5 I honestly don't remember any specifics other 6 than the incident with the keys, which, in my opinion, 7 since it was the only thing I actually had first-hand 8 knowledge of, didn't happen, and then the allegation of domestic violence. 10 Okay. Do you know there's an allegation that the 11 Appellant attempted to break into 12 apartment? 13 I actually did hear of that, yes. 14 Okay. Have you seen video of him attempting to 15 break into her apartment? 16 Α No. 17 If, in fact, the Appellant did attempt to break apartment, would that change your 18 into 19 opinion about his character at all? 2.0 My opinion of his character is based on my 21 personal experience with him. If I were to see a video of 22 him breaking in, just like videos on the internet or 23 YouTube, I would want to see the whole thing and know the whole totality of the circumstances before I changed my 24 2.5 opinion of his character.

1	Q Okay. If the Appellant strangled
2	and left marks and bruising on her, would that affect your
3	opinion of his character?
4	A Yes.
5	Q And you testified under direct that the Appellant
6	would do nothing to disrespect the uniform or the badge;
7	do you remember that testimony?
8	A I do.
9	Q If the Appellant strangled and left
10	marks on her, would you consider that to be a disrespect
11	to the uniform and the badge?
12	A I would.
13	MS. ROAM: I have no further questions.
14	HEARING OFFICER SCULLY: Okay. Thank you.
15	Any redirect?
16	
17	REDIRECT EXAMINATION
18	BY MR. GOLDFEDER:
19	Q If made allegations that were false
20	against Deputy Mandoyan, would you consider that to be a
21	disrespect to the uniform or the badge?
22	A Yes.
23	Q If lied about Deputy Mandoyan
24	breaking into her apartment, would you consider that to be
25	a disrespectful act that reflects negatively on the

```
Department, the uniform and the badge?
1
2
           Α
               Yes.
               Have you had any interactions with
 3
      as far as interacting with her in the field, beyond just
 4
      an occasional call?
 5
               I would respond to calls with her. She kind of
 6
 7
      stayed off to herself a lot. So I would see her at calls,
      help her handle calls, if she needed assistance with
8
      something I would help her. Never any negative, you know,
      conflict with her revealed at all.
10
11
               MR. GOLDFEDER: Nothing further.
12
               HEARING OFFICER SCULLY: Okay. Think that's all
13
      we have for
14
               MR. GOLDFEDER:
                                Yes.
15
               MS. ROAM: Yes.
16
               HEARING OFFICER SCULLY:
                                         Thank you,
17
                          Thank you for your patience today.
      Thank you.
18
19
               Who is the next witness?
2.0
               MR. GOLDFEDER:
21
               HEARING OFFICER SCULLY: Hang on, before you sit.
22
      I will have you raise your right hand before you sit.
23
      ///
      ///
24
2.5
      ///
```

1 2 produced as a witness by and on behalf of the Appellant and having been first duly sworn by the Hearing Officer, 3 was examined and testified as follows: 4 5 HEARING OFFICER SCULLY: Okay. Thank you. 6 7 a seat and then state and spell your first and last name 8 for the court reporter. THE WITNESS: My name is 10 11 HEARING OFFICER SCULLY: Okay. Thank you. 12 All right. Mr. Goldfeder. 1.3 MR. GOLDFEDER: Thank you, your Honor. 14 15 DIRECT EXAMINATION 16 BY MR. GOLDFEDER: 17 , can you tell us the hire date for yourself on the Department and give us a brief resume of 18 where you've worked since that time? 19 I was hired in December of 1996. I worked 2.0 21 approximately four years in various jails, custody 22 capacity. In 2001, January, I went up to patrol at 23 Century Station. I was assigned at Century Station for 24 nine years, until 2010. February of, I promoted to

2.5

Sergeant.

I was transferred to Twin Towers Correctional 1 2 Facility for approximately 11 months, then I was assigned to Temple Station for approximately 12 months, and 3 transferred to Internal Criminal Investigations Bureau for 4 5 approximately two years. 6 In 2013 I promoted to the rank of Lieutenant, 7 where I was assigned to South LA Station for three years, 8 and recently transferred to Homicide Bureau. Thank you, Lieutenant. Q 10 And do you know Deputy Caren Mandoyan? 11 Α T do. 12 And where do you know Deputy Mandoyan from? 13 Α As a Watch Commander at South LA Station, he was 14 a patrol deputy. 15 And at any point in time while you were both over at South Los Angeles Station, was Deputy Mandoyan promoted 16 17 to a Field Training Officer, a FTO? 18 Α Yes, he was. And what's the criteria to become a 19 2.0 Field Training Officer on the Sheriff's Department? 21 Experience in the field, knowledge of Patrol 22 Policies and Procedures, and a willingness to teach new 23 personnel those policies and procedures. 24 Is that considered a prestigious position, to

become a Field Training Officer?

2.5

1	A It is.
2	Q As a Field Training Officer, does that position
3	entail training new deputies to become patrol-experienced?
4	A Correct.
5	Q Did you have occasion to see Deputy Mandoyan
6	interact as an FTO with trainees at the time you were both
7	at the South LA Station?
8	A I did.
9	Q How would you characterize Deputy Mandoyan as a
LO	Field Training Officer based upon your experience as
L1	Lieutenant on the Sheriff's Department?
L2	A Professional and competent, very competent.
L3	Q And do you have an opinion as to the character of
L 4	Deputy Mandoyan from your perspective as Lieutenant on the
L 5	Department?
L 6	A Yes. He was an individual that I could count on
L7	during the course of my shift to handle any type of issues
L 8	or patrol-related issues that may arise.
L 9	Q In your estimation, was Deputy Mandoyan a person
20	of integrity?
21	A Yes.
22	Q Is Deputy Mandoyan a person that tells the truth,
23	from your interactions with him?
24	A Yes.
25	Q Do you recall an event from June 3rd, 2015, with

1 Deputy Mandoyan and you in regard to a phone call that he 2 received? 3 Α Yes. And if I could show you what's been premarked 4 5 here, Appellant's exhibit -- I believe we we're up to 60 in order. 6 7 HEARING OFFICER SCULLY: 61. 8 MR. GOLDFEDER: Oh. 61. I'm sorry, your Honor. 9 HEARING OFFICER SCULLY: Because those two pages of the -- missing pages from the protective order 10 11 application are 60. 12 (Appellant's Exhibit 61 was marked for 13 identification by the Hearing Officer.) 14 MR. GOLDFEDER: Very good. I apologize. 15 BY MR. GOLDFEDER: I want to show you what's been marked as 16 17 Appellant's Exhibit 61, Please review 18 that document, and when you've had chance to look at the 19 contents --2.0 HEARING OFFICER SCULLY: Thank you. 21 THE WITNESS: Okay. 22 BY MR. GOLDFEDER: 23 What is that document, 24 It's an office correspondence that 2.5 Deputy Mandoyan authored.

Okay. And can you tell us the basis for why this 1 2 office correspondence was authored by Deputy Mandoyan? It was an office correspondence authored due to 3 the contact or phone call he received from and 5 they had a discussion or an argument while he was at work. 6 On June 3rd, 2015, was Deputy Mandoyan working 7 under your command over at South Los Angeles Station? 8 Α Yes. And what was his assignment on that day? 10 He was working in the dispatch area. Is that working as, like, a complaint deputy, 11 Q 12 handling calls for Civil Service and dispatch and things of that nature? 13 14 Correct. Α 15 Is that considered an important assignment on the Sheriff's Department? 16 17 It is. Α 18 And the reason for that is? 0 19 During the course of the shift, you may take 2.0 phone calls from people who are distraught and in need of 21 help, and it's important to gather information in a timely 22 manner in order to disperse that information to units in 2.3 the field. 24 Okay. And at the point in time this office 2.5 correspondence was drafted, did that involve some type of

phone communication that Deputy Mandoyan received? 1 2 Α Yes. What was your understanding of that phone 3 communication? 4 5 That he received the phone call from an 6 ex-girlfriend and she was yelling at him, using profanity 7 at him. And after this phone call was received by 8 0 9 Deputy Mandoyan, did he approach you in regard to this phone conversation? 10 11 Α Yes. 12 What did the two of you discuss at that point? I directed him to draft an office correspondence. 13 Α 14 Okay. The purpose of having to draft an actual 15 office correspondence was for? To notate the content of the conversation. 16 17 During the time period you've been on the 18 Sheriff's Department, whether as a Deputy, Sergeant or as 19 Lieutenant, have you ever had an individual come up to you 2.0 in regard to a disturbing phone call that they had 21 received in a personal capacity? 22 Not that I can recall. 23 Would it be correct to say that this was the first time someone had come to you in your capacity as 24 Watch Commander with this kind of information? 2.5

Of a personal nature, that I -- none that I can 1 2 recall previous to this. Okay. Is it unusual to draft some sort of office 3 4 correspondence or memorandum by a deputy for a personal 5 phone call that was received? Is it unusual? No, if I believe that the 6 7 information is significant. And what was it about the information that was 8 0 9 conveyed to you by Deputy Mandoyan about this personal 10 phone call he received from that you found 11 concerning or important to document? 12 Α Just the verbiage in the -- during the course of the phone conversation that he had while he was at work 13 14 with her. 15 And would that be in the context of, you know, the four-letter language being used, you know, Say goodbye 16 17 to your fucking job, you fucking idiot, or is it more 18 along the lines of the context of those threats being 19 made? 2.0 MS. ROAM: And I'm just going to object. It's 21 leading. 22 HEARING OFFICER SCULLY: Sustained. 23 Can you rephrase that, please? 24 MR. GOLDFEDER: Certainly. /// 2.5

1	BY MR. GOLDFEDER:
2	Q What was the primary reason you were concerned
3	enough to have Deputy Mandoyan draft this particular
4	document?
5	A The overall content of the conversation.
6	Q Would that be because the person that made the
7	phone call was another member of the Sheriff's Department?
8	A Not necessarily. It was also reference of
9	contacting me, and if the individual contacted me at a
10	later date, I may or may not remember all the content of
11	the conversation that I had with Mr. Mandoyan, so I
12	directed him to notate that conversation.
13	Q Was this a phone call received on
14	Deputy Mandoyan's personal phone as opposed to a work line
15	at South LA?
16	A I believe it was his personal phone.
17	Q Did you ever look at Deputy Mandoyan's phone to
18	see if a phone call was received?
19	A No.
20	Q Would it be correct to say, Lieutenant, that you
21	took Deputy Mandoyan's word?
22	A Yes.
23	Q And based upon your experience with
24	Deputy Mandoyan working as a sheriff under your command?
25	A Correct.

1	Q How long had Deputy Mandoyan worked under your
2	command at South LA Station at the time this call came in?
3	A Approximately two years.
4	Q And during that two-year period, have you ever
5	had any issues with Deputy Mandoyan's truthfulness?
6	A No.
7	Q Have you ever had any issues during that
8	two years with Deputy Mandoyan's integrity?
9	A No.
10	Q Was Deputy Mandoyan an honest employee from your
11	standpoint?
12	A Yes.
13	Q Now, if another deputy sheriff called and
14	threatens a deputy sheriff's job, is that some type of
15	conduct that's considered inappropriate in the
16	Sheriff's Department?
17	A Yes.
18	Q Now, prior to your appearance here today, have
19	you come to understand any factual information as to what
20	the allegations in this hearing consist of?
21	A Not about facts, no.
22	Q Okay. Anything you heard through the rumor mill
23	or grapevine as to, you know, Deputy Mandoyan?
24	A That he was terminated due to issues from
25	related to his relationship with

1	Q Okay. And without knowing the facts of the case,
2	if was making allegations as far as some
3	kind of domestic allegations against Deputy Mandoyan,
4	would you believe the basis of those allegations just
5	based upon somebody making a statement to you?
6	MS. ROAM: I'm just going to object. I think
7	that calls for speculation.
8	HEARING OFFICER SCULLY: Yes. Sustained.
9	Can you rephrase your question? I'm not sure
10	what you're getting at.
11	MR. GOLDFEDER: Certainly.
12	BY MR. GOLDFEDER:
13	Q Have you ever had occasions when you had to, you
14	know, handle complaints against personnel in your command?
15	A Yes.
16	Q Have you had occasion where you've been involved
17	in an investigation of those complaints against
18	individuals in your command?
19	A Yes.
20	Q Have you had occasion where those complaints made
21	against individuals in your command have been false and
22	baseless?
23	A Yes.
24	Q And based upon those experiences, if you were
25	asked whether Deputy Mandoyan committed acts of domestic

misconduct against someone, without having any investigative material, would you have an opinion as to the foundation of that information?

MS. ROAM: I'm going to object. I didn't understand that question.

HEARING OFFICER SCULLY: Well, I think -- I'm going to sustain it. I mean, it's really irrelevant.

You're -- I think you're essentially asking him to vouch for -- without knowing any of the facts in the case, you know, who do you believe, Deputy Mandoyan or

He already said -- he's testified to his view of Deputy Mandoyan's character, I got that down, his reputation and his character for truthfulness, and he doesn't know the allegations. He doesn't know if they're true or not.

He hasn't done any -- not interviewed anyone, so he really doesn't have -- can't have a reasonable opinion about the ultimate outcome of the case. So that's why the objection is sustained.

BY MR. GOLDFEDER:

2.0

2.5

Q Based upon the content of this memorandum, which is Appellant's Exhibit 61, do you have any reason to disbelieve what Deputy Mandoyan wrote in this document?

A No.

ſ		
1	Q And what's your reason fo	er not disbelieving
2	anything in this document?	
3	A Just past relationships w	with him.
4	Q And based upon Deputy Man	ndoyan being a
5	professional Field Training Office	er?
6	A Correct.	
7	Q Have you ever worked with	Deputy Mandoyan at any
8	other units of assignment?	
9	A None that I know of.	
10	Q And you were interviewed,	as part of this
11	Civil Service Hearing process, by	Internal Affairs Bureau?
12	A Correct.	
13	Q Have you ever had	working in your
14	command?	
15	A Not that I know of.	
16	Q Were you ever contacted b	in
17	regard to this particular memorand	lum at any point in time?
18	A I was not.	
19	MR. GOLDFEDER: Nothing f	further.
20	HEARING OFFICER SCULLY:	Any cross-exam?
21	MS. ROAM: Yes, please.	
22		
23	CROSS-EXAMINA	TION
24	BY MS. ROAM:	
25	Q , thank y	ou for your patience. I

1	know you've been waiting around for a long time.
2	Did ever contact you and make a
3	complaint against Caren Mandoyan?
4	A No.
5	Q Now, the evening that this happened, do you know
6	if this was Caren Mandoyan's regular shift?
7	A He was an early mornings deputy, and this
8	occurred on p.m. shift, so I would say no, not unless he
9	was assigned a double.
10	Q Okay. If I showed you an in-service, would it
11	refresh your recollection as to whether or not it was
12	his and I will show it to Counsel first his regular
13	shift or if he were working overtime?
14	MR. GOLDFEDER: Is this in the book?
15	MS. ROAM: It is not. I'm just showing it to him
16	to refresh his recollection.
17	THE WITNESS: Okay.
18	BY MS. ROAM:
19	Q Was this his regular shift or was he working
20	overtime?
21	A He was working overtime.
22	Q Okay. And do you know if was aware
23	that he was on duty when she called him?
24	MR. GOLDFEDER: Objection. That calls for
25	speculation.

1	HEARING OFFICER SCULLY: Well, sustained.
2	Do you have any reason to believe he has
3	knowledge of what knew?
4	MS. ROAM: No. I'll withdraw.
5	HEARING OFFICER SCULLY: Sustained.
6	BY MS. ROAM:
7	Q Now, interviewed you as part
8	of this investigation; is that correct?
9	A Yes.
10	MS. ROAM: And I would like to mark a copy of
11	that interview. This is going to be Department's next in
12	order, which I believe is 32. Yes.
13	(Department's Exhibit 32 was marked for
14	identification by the Hearing Officer.)
15	MS. ROAM: And this is a copy for the binder.
16	You can just leave it and I will put it in later.
17	Did I give you more than one copy? Okay. That's
18	why I'm missing mine. Thank you.
19	BY MS. ROAM:
20	Q And if you would, , just take a
21	look at that and see if you recognize what this document
22	is.
23	A Appears to be a transcript of the interview I had
24	with .
25	Q Okay. Have you seen this document before?

1	A No.
2	Q Okay. During your interview with
3	, were you honest?
4	A Yes.
5	Q Okay. And you said at the point that this
6	happened in June of 2015, that you had worked with
7	Caren Mandoyan for approximately two years; is that
8	correct?
9	A In this document?
10	Q No. I'm sorry. During your direct testimony,
11	did you testify that at the time that this memo was
12	authored, the date of this incident, you had worked with
13	Caren Mandoyan for approximately two years?
14	A Yes. I was assigned to South LA Station
15	November of 2013.
16	Q Okay. Now, do you know what a Reaper is?
17	MR. GOLDFEDER: Objection. Relevance at this
18	point.
19	HEARING OFFICER SCULLY: Well
20	MS. ROAM: I think he's brought the Appellant's
21	character into question here, so I think it has some
22	relevance if the Appellant claims to be a member of a
23	Department clique, and his opinion or understanding of the
24	Department's position on that.
25	MR. GOLDFEDER: First of all, it also is

irrelevant on a basis of he could be a member of the 1 2 Republican or Democratic Party. I don't know how that impacts on his character one iota. 3 4 MS. ROAM: Except for the Department doesn't get 5 involved in your political affiliation, but they do have a 6 position regarding deputy cliques. 7 MR. GOLDFEDER: And that isn't a charge in this 8 case whatsoever, let alone a policy in existence. HEARING OFFICER SCULLY: Didn't we -- wasn't 10 there -- didn't this come up before? I vaguely recall 11 this came up before. 12 MS. ROAM: Yes. 13 HEARING OFFICER SCULLY: And I'm not sure what 14 the -- I'd have to look at my notes to see what the 15 context was, but your offer of proof on this is what, that you believe there is some evidence that Deputy Mandoyan 16 17 was a member of a group called The Reapers, which is a 18 prohibited clique of deputies? 19 MS. ROAM: He has a Reaper tattoo on his ankle. HEARING OFFICER SCULLY: So you want to attack 2.0 21 his character on that? 22 MS. ROAM: Yeah. 23 HEARING OFFICER SCULLY: Is it misconduct to have 24 that association, because I think Counsel said it wasn't a

2.5

charge.

MS. ROAM: It's not a charge, but obviously he's bringing the Appellant's character into this, and I think, you know, you can certainly prescribe it whatever weight you deem is appropriate, but I wanted to ask, basically, two questions about this.

2.0

2.5

MR. GOLDFEDER: Again, your Honor, it's irrelevant, and his character as to being truthful and honest has nothing to do with whether he has a tattoo or wears a Timex watch or uses Prell shampoo. There's no Departmental policy that's been provided as part of their Letter of Imposition.

MS. ROAM: No. But, if you recall

's testimony the first day that she was here, that he threatened her with the fact he was a Reaper and he knows people on the Department and she felt threatened by that.

She testified today why she was glad another agency was handling this investigation because she believed his claim that he had tentacles throughout the Department.

MR. GOLDFEDER: Yeah. Tentacles that reached to the point as she could not even get a job at Special Victims Bureau because she never filed an application.

So I think there is absolutely no foundation

here, whatsoever, and it's just a -- not even a Hail Mary pass. It's basically a baseless attack and smear on an individual for having a tattoo of a station mascot.

2.0

2.5

HEARING OFFICER SCULLY: Well, my concern is that the potential prejudice to Appellant, that is, it's not something that's part of the charges, so it's not really developed in terms of the evidence -- is he a member of this group? Is it a bad group? Is it a good group?

But, you know, being a member of a group called

The Reapers could have just sort of a taint. It could be
a taint, you know, sort of a prejudicial taint, because
there's no factual basis that's going to be offered at the
hearing based on witnesses who have personal knowledge.

So I'm a little concerned that it could be used to sort of taint him and sort of, like, everything he's involved with is tainted because he's a Reaper. He's untrustworthy because he's a Reaper.

We have witnesses who have personal experience working with him, as we did with _______, that testified as to his professional -- how he presented himself in the Department, his reputation and the Lieutenant's -- the Watch Commander's experience of him. So I'm a little concerned this is kind of -- you know, it's just a taint.

But are there going to be, for example, facts,

evidence, witnesses who will say, This is what The Reapers have done, and this is why being a Reaper is a bad person?

Or is it just, he's allowed to call him a name and say he's a Reaper, where it's, you know, we don't have a factual basis for it.

Is there some -- do we have evidence he was at a ceremony? I mean, I understand the tattoo. Do you see

2.0

2.5

ceremony? I mean, I understand the tattoo. Do you see what I mean? It's kind of a -- my concern is that it's prejudicial to the Defendant to -- or to the Appellant, sorry -- to say that -- to just throw out an allegation that he's a member of this group without really any evidence of what the group is all about, how do we know he's a member or not, is it a bad thing or a good thing, does the Department approve of it or not?

That's my concern with it.

MS. ROAM: I think it might be relevant to the Lieutenant's opinion whether he knows or not that Caren Mandoyan claims to be or does not claim to be a Reaper.

HEARING OFFICER SCULLY: Well, let me ask Lieutenant.

Do you know -- have you ever heard of a group called The Reapers?

THE WITNESS: I have.

HEARING OFFICER SCULLY: What do you know

1 about -- what have you heard about them? What do you know 2 about them? As a Watch Commander at South LA Station, 3 what do you know about The Reapers? 4 THE WITNESS: Deputies assigned to Lennox or 5 South LA Station who have worked hard are at some point 6 given a tattoo of the station logo acknowledging that hard 7 work. 8 HEARING OFFICER SCULLY: Is there any kind of 9 negativity in your mind associated with that tattoo? 10 THE WITNESS: Not that I know of. 11 HEARING OFFICER SCULLY: So if you were told that 12 Deputy Mandoyan has a tattoo, would that change in any way 13 your opinion of him? 14 THE WITNESS: Of a negative viewpoint, no. 15 HEARING OFFICER SCULLY: Positive or negative, would it change anything that you think about him? 16 17 THE WITNESS: If I were to not know him and 18 somebody told me that he had that tattoo, I would say, A, 19 he's been at the station for a significant amount of time, 2.0 and two, he was a hard worker. 21 HEARING OFFICER SCULLY: So it might actually 22 even improve your estimation of him? 2.3 THE WITNESS: It could. 24 HEARING OFFICER SCULLY: Well, I appreciate your 2.5 testimony, because I was -- and that's why my concern was

```
about this whole subject, because in my mind I'm thinking
1
2
      this must be some bad clique that does bad things, or, you
      know, maybe violates people's Civil Rights -- I don't
 3
      know. I have no idea. I just have this negative
 4
      association with it.
 5
 6
               So you've kind of cleared that up for me, though,
 7
      but see, that was my concern about the whole subject
8
      matter, because I don't have knowledge of it, and --
               MS. ROAM: Those were the questions I was going
10
      to ask.
11
               HEARING OFFICER SCULLY:
12
      BY MS. ROAM:
13
           Q
                                , are you a Reaper?
14
           Α
               No.
15
               I want take you to what happened on June 23rd of
           0
      2015.
16
17
               When the Appellant reported this phone call to
18
      you --
               I'm sorry, June 3rd?
19
           Α
2.0
           Q
               June 3rd -- Did I say something other than that?
21
           Α
               I'm just making sure.
22
               Okay. Yeah, June 3rd.
           0
23
               What did the Appellant tell you?
24
           Α
               Basically that he received a phone call from his
      ex-girlfriend, and this is based on the memorandum.
2.5
```

basing this information off that. 1 2 Do you have any independent recollection of what he told you as you sit here today? 3 Very little. It's been a few years. 5 Did he indicate to you how long he and his 6 girlfriend had been broken up? 7 Six months, according to the memorandum. 8 Did you understand that was a 9 Department member? 10 Α Yes. 11 And when he reported this, did he express concern 12 to you that might make some false allegation against him? 1.3 14 He was concerned that she would contact me, yes. 15 Was he forthcoming with information about the 's relationship? 16 nature of his and 17 I would say yes, based on the fact that he approached me, I didn't approach him. 18 Now when Caren Mandoyan told you that 19 20 was going -- threatened to report that he attempted to 21 break into her apartment, did you ask him if he had broken 22 into her apartment or attempted to break into her 23 apartment? 24 Α I don't recall. 2.5 Okay. I'm going to turn your attention to the

1	transcript of your interview with
2	It's been marked Department's Exhibit 32, and turn you to
3	page 3, and your first answer under the center hole punch.
4	A Uh-huh. Okay.
5	Q Does that refresh your recollection?
6	A Yes.
7	Q Okay. And did you in fact ask Caren Mandoyan if
8	he had broken into 's home?
9	A Yes.
10	Q What did he tell you?
11	A He said that he did not and they were having an
12	argument.
13	Q Okay. Did he tell you anything else about this
14	argument?
15	A Not that I recall.
16	Q And based on what he told you, you had him write
17	this memo that's been marked as Appellant's Exhibit 61?
18	A Correct.
19	Q And did you review the memo?
20	A Yes.
21	Q And did it contain what he had told you verbally?
22	A Yes.
23	Q Did he leave out anything that you considered
24	significant, anything out of this memo that he had
25	reported to you verbally?

1	A None that I recall.
2	Q Did the Appellant ever tell you that had
3	locked him out of her apartment after they got into an
4	argument?
5	A Locked him out of his own apartment?
6	Q Out of her apartment.
7	A Not that I recall.
8	Q Did the Appellant ever tell you he had property
9	inside of her apartment?
10	A He may have, but I don't recall specifically.
11	Q Okay. So just tell us to the best of your
12	recollection what he would have told you.
13	A On this day?
14	Q Yes.
15	A Basically what's documented on the memorandum.
16	Q Okay
17	A So I'm sorry.
18	Q No, go ahead.
19	A The purpose of me having him write the
20	memorandum, as we can see, memories fade after time, and
21	it was my intention on trying to notate portions of the
22	event in order to recall, like today, if necessary.
23	Q Okay. Did the Appellant tell you that
24	was video-recording him as he was attempting
25	to get into her apartment?

1	A I don't recall.
2	Q Okay. If he had told you that, would you have
3	expected him to include that in his memo?
4	A That she alleged he was being videotaped during
5	the course of the contact?
6	Q That he knew that she was videotaping him as he
7	attempted to break into her apartment.
8	A Sure, yes.
9	Q Okay. Did the Appellant tell you that she told
10	him to stop breaking into her apartment or stop trying to
11	break into her apartment?
12	A I don't recall.
13	Q Okay. Did the Appellant tell you that she
14	eventually let him back into her apartment?
15	A On a different date?
16	Q No. On the date that she's alleging that he
17	attempted to break she's alleging that he attempted to
18	break into her apartment.
19	A Did she allow him to come back inside? I don't
20	recall.
21	Q Okay. Did he say anything to you about after he
22	came inside, she showed him the video she had taken and
23	they both laughed about it?
24	A No, I don't recall that.
25	Q If those things had happened, would you have

expected him to tell you? 1 2 Α Yes. HEARING OFFICER SCULLY: Well, this memo is the 3 report of a phone conversation, so --4 5 MS. ROAM: Okay. So --6 HEARING OFFICER SCULLY: I mean, this isn't --7 the conversation he, I understand, is he's -- he was just 8 describing the phone conversation, not the entire history of the relationship. BY MS. ROAM: 10 11 Okay. So when he reported 's phone 12 conversation to you, the concern was she was alleging that 1.3 she was going to report that he attempted to break into 14 her apartment; is that correct? 15 She was alleging -- well, based on the memorandum -- it's not specific. It's kind of general in 16 17 the sense of he messed up, she's going to call me, things 18 of that nature. So I'm going to call your attention to the third 19 20 paragraph in the memo down, about in the middle where it 21 reads: 22 "She continued yelling and stated, 23 fuck you. You fucked up. I'm going to 24 call your watch commander and tell him 2.5 that you broke into my place."

1 Do you recall him telling you that this was part 2 of the conversation? I recall it because I'm reading it on the 3 memorandum. 4 5 Did he provide any context for why she was alleging that she was going to report -- why she was 6 7 threatening to report him for breaking into her house? 8 MR. GOLDFEDER: Objection. Lacks foundation. 9 Calls for speculation. He reported what was said --10 stated to him in a phone conversation. 11 HEARING OFFICER SCULLY: Well, aside from what 12 you wrote -- what is in this memo, I'm sorry. 1.3 You didn't write it, did you? 14 THE WITNESS: I did not write it. 15 HEARING OFFICER SCULLY: Aside from what's in 16 this memo, do you have a separate recollection of anything 17 Deputy Mandoyan told you about this particular phone call? THE WITNESS: None that I can recall. 18 19 the purpose of me having him write the memorandum. 2.0 HEARING OFFICER SCULLY: Right. So do you 21 recall -- were you given any kind of background facts, 22 other than what's in the memo, when you had a conversation 23 with Deputy Mandoyan? 24 THE WITNESS: As far as their relationship? 2.5 HEARING OFFICER SCULLY: The relationship, the

conflict, you know, the whole -- any disputes between them 1 2 of any kind. THE WITNESS: I don't recall having a 3 conversation with Deputy Mandoyan prior to this date about 4 5 his relationship with 6 HEARING OFFICER SCULLY: How about when this was 7 drafted, during that context. 8 Did you have any conversations about the 9 relationship? THE WITNESS: I'm sure we had conversations about 10 11 the relationship, but --12 HEARING OFFICER SCULLY: Okay. 1.3 THE WITNESS: I don't recall specifics. 14 HEARING OFFICER SCULLY: Okay. Well, then you 15 can ask about those conversations. BY MS. ROAM: 16 17 Okay. What did you understand to be their 18 relationship? 19 They were in a dating relationship. 2.0 Q Okay. Did he tell you anything else about their relationship? 21 22 That they broke up. 23 Anything else? 24 They dated for two years, they broke up, and it was a rocky breakup. 2.5

1	Q Now, were you concerned that had
2	engaged in some type of misconduct by initiating this
3	phone call and threatening Deputy Mandoyan?
4	A I reviewed it. I did notify Operations. There
5	were some questions, i.e., the memorandum, but after
6	reviewing it, I determined there wasn't a POE violation.
7	Q Okay. Did you determine whether there was any
8	allegation of a violation of policy?
9	A I did.
10	Q Okay. And did you recommend that an internal
11	administration administrative investigation be
12	initiated?
13	A No.
14	Q Why?
15	A I notified Operations and advised them of this
16	incident, and provided the memorandum to Operations.
17	Q And, , do you know what the
18	penalty is for a deputy who lies during an IAB
19	investigation or interview?
20	A Termination.
21	Q What about if they make misleading statements
22	during an IAB interview?
23	A Same.
24	MS. ROAM: I have no further questions.
25	HEARING OFFICER SCULLY: Okay. Any redirect?

1	MR. GOLDFEDER: No.
2	HEARING OFFICER SCULLY: All right.
3	, thank you for your assistance
4	and cooperation with us here today. I appreciate it. You
5	can just leave those documents on the table right there,
6	we'll take care of it, and have a nice afternoon.
7	THE WITNESS: Thank you.
8	MS. ROAM: Thank you.
9	HEARING OFFICER SCULLY: Mr. Goldfeder, do we
10	have any more witnesses today?
11	MR. GOLDFEDER: No.
12	HEARING OFFICER SCULLY: Okay. We do have the
13	issue of the expert witness.
14	MS. ROAM: Yes, we do.
15	HEARING OFFICER SCULLY: And we're going to
16	Mr. Goldfeder is going to decide if he wants to contact
17	his client I mean, not contact call his client as a
18	witness on Friday or the next hearing day, which I guess
19	we are at that point now.
20	Are you ready to let Counsel know what your
21	thoughts are on that?
22	MR. GOLDFEDER: As far as expert witness?
23	HEARING OFFICER SCULLY: No. As far as calling
24	your client as a witness.
25	MR. GOLDFEDER: I'm going to have to digest that

```
before I decide.
1
2
               HEARING OFFICER SCULLY: Okay. As early as you
      can, let Counsel know so she knows -- well, I would say
 3
 4
      prepare for cross-examination.
 5
               MS. ROAM: Can I know by tomorrow? I mean, he
 6
      should know by tomorrow; right? I mean, we're back on
 7
      Friday.
 8
               HEARING OFFICER SCULLY: You think you can let
9
      Counsel know by tomorrow, say, noon?
               MR. GOLDFEDER: I'll be in court tomorrow so I
10
11
      don't know if I will have time to flip through all my
12
      notes. I will call before the close of business tomorrow.
1.3
               Is that 4:00, 4:30 for you, Sergeant?
14
               MS. ROAM: That's fine.
15
               HEARING OFFICER SCULLY: Okay. All right. I
16
      read the -- we're talking about
                                                  , and I read
17
                                             's letter to
      the letter to me -- I read
18
      Sergeant Roam, which essentially describes what she's
19
      going to say --
2.0
               MS. ROAM: Yes.
21
               HEARING OFFICER SCULLY: So this --
22
      is an LCSW, a Licensed Clinic Social Worker.
23
               She's never actually spoken to or examined
24
                ; right?
2.5
               MS. ROAM: That's correct.
```

HEARING OFFICER SCULLY: So all she's going to do is talk in general about domestic violence victims, and -- you know, I don't know that her testimony is going -- well, I question if her testimony is going to be that helpful to me.

1.3

2.0

2.5

I'm somewhat familiar with, you know, the process of domestic violence victims. I had a case where I was a prosecutor once where the guy stood over his wife and beat her on the side of the road, on the side of the freeway, in plain sight of the Highway Patrol, and she came in and didn't want him -- said, No. He didn't touch me.

But I don't think we have those facts here. We don't have a relationship characterized by that kind of domestic violence. We have her allegation of one incident, but I don't know. I mean, if we call her, she's going to get a lot of hypothetical questions, and so all she's really doing is testifying theoretically as to the theory of domestic violence and how different people react, but she hasn't really examined the evidence in the case --

MS. ROAM: She has.

HEARING OFFICER SCULLY: She has?

MS. ROAM: She has not interviewed she has reviewed the material in this case, and the purpose for her testimony is to testify about recognized

patterns of behavior of women who have been subjected to long-term abuse.

1.3

2.0

2.3

2.5

And so I think in this case where the evaluation of the credibility is critical, that type of expert testimony can help explain a lot of counterintuitive behaviors, a lot of things that leave us scratching our head and wondering why things happen the way they do.

I attached 1107 of the Evidence Code because that section specifically says that, you know, this is not -this is a recognized area for expert testimony, and while
I understand that you might have some experience in that,
I would like for our record -- this is a discharge case,
and I would like our record to be complete.

HEARING OFFICER SCULLY: Well, like, I did read the case, the People v. Humphrey, the two cases you gave me, and there's an extensive section on battered woman syndrome.

Is it your claim or contention that we're dealing with the battered woman syndrome in this case?

MS. ROAM: Yes. They don't call it battered woman syndrome any longer, that's gone out of vogue, but they do refer to it as intimate partner battering, and its effects --

HEARING OFFICER SCULLY: See, I understand there was testimony and evidence about her claiming that she was

assaulted, or domestic violence. There's also evidence that -- well, that might call into question her credibility, and I'm just concerned that there might be -- that some of this expert witness testimony is an attempt to just bolster her credibility and say this is why she might appear to be not credible.

I take it that she's a deputy on the Department. She's been through a lot of training. She has to be a tough, strong, forceful woman, and she's kind of responsible for herself.

MS. ROAM: So I think it's exactly what you just said, why said, why set statement is absolutely critical. She has special expertise dealing with domestic violence when you have two people who are in law enforcement.

She has worked with the LAPD for a very long time. She has testified at Boards of Rights Hearings where deputies have been discharged behind domestic violence allegations.

The disparity and power here — there are so many elements that go right along with the pattern of abuse, and whether you want to give weight to her testimony or not, it's ultimately for you to determine, but there is significant relevance to her testimony.

HEARING OFFICER SCULLY: Well, so let's hear from Mr. Goldfeder.

1	MR. GOLDFEDER: First of all, your Honor, under
2	1107, her testimony is only allowed in criminal cases.
3	And the cases that were attached go to the whole issue of
4	domestic battering and the context of CALCRIM instructions
5	for
6	MS. ROAM: I'm sorry. You just handed Mr. Scully
7	something. Do you have
8	MR. GOLDFEDER: Here you go. Excuse me.
9	MS. ROAM: Thank you so much.
10	MR. GOLDFEDER: So when you have issues of
11	imperfect defense as Flannel issues and things of that
12	nature in regard to criminal cases, you have to have a
13	predicate of an actual filing by a District Attorney.
14	1107 says expert testimony well, first of all,
15	it starts off, "In a criminal action." That's why all the
16	cases are People verses whomever the defendant is. And it
17	goes on to say:
18	"This evidence is allowed for certain
19	purposes, except when offered against a
20	criminal defendant to prove the occurrence
21	of the act or acts of abuse which form the
22	base of the criminal charge."
23	There is no criminal charge here. This evidence
24	is solely limited to a criminal action under 1107.
25	Otherwise, all it is is just impermissible witness

vouching, and, you know, whether or not the California Legislature wants to amend 1107 to allow in anywhere other than a criminal action, you know, it's up to the State of California to do.

1.3

2.0

2.5

But it is not allowed in any other arena for that very reason, because now you are bringing in someone to talk about a theoretical event that never took place. The District Attorneys in this matter decided there was no basis for any criminal filing to be made, and that is the arena for which an expert for domestic violence can be brought in by either the prosecution or the defense.

So, for example, if the defendant is on trial for murder and is trying to use that he or she is a domestic violence victim, and now they are fighting back for some kind of Flannel defense for a justifiable homicide, then that relevance is going to be ruled upon from a judicial standpoint as to whether or not that factual basis is going to be permitted. And that's strictly in a criminal arena under 1107.

So now Sergeant Roam wants to conflate that section by bringing someone into a Civil Service Hearing, and the state of California said you cannot do that. This is why 1107 is structured the way it is. It's very limited for when you can bring this testimony in, and then it's subject to a 401 Hearing, and then, you know, of

course a 352 in front of a jury.

1.3

2.0

2.5

So there's no basis for bringing this in other than to bolster the credibility of their witness, which is impermissible witness vouching. And this is not able to do that even if she reviewed all the materials in this case. I'm not even sure if there's a fundamental basis for her to be allowed if we were arguing this over in criminal court. I think it would be bounced out on a 402 Hearing because there's no foundation for it.

think that's -- those are some strong points. The other thing is that this type of testimony, even in a criminal case, it's used, for example, if a prosecutor might want to bring in this type of evidence when there's a prosecution of an alleged batterer, alleged abuser, and the alleged victim recants and says, you know, It was me. I fell against the stove. That's why I ended up with a black eye.

We don't have that here. We have the alleged victim who's not recanting at all. She's not withdrawing anything at all. So I'm not seeing where the actual foundation for this type of testimony is other than to just bolster her credibility, to say -- well, you know -- and I haven't made any credibility findings, but it's like you're anticipating that she might be found not credible

on one or more issues, and you want to offer an expert to say, This is why domestic violence victims are not credible.

1.3

2.0

2.5

But if she's not credible, at what point -- I mean, the whole Department's case is built, for the most part, on her credibility. So if the expert's point is to say this is why she's not credible, or -- you know, I'm not sure what it is that this expert is going to address.

And there is an issue that Counsel raised that says this type of, you know, testimony regarding intimate partner battering and its effects, including the nature and effect of physical and emotional or mental beliefs — abuse on the beliefs perceptions of behaviors of victims of domestic violence, when offered against a criminal defendant, you know, that's when it's admissible. We don't have that here.

MS. ROAM: Okay. May I be heard?
HEARING OFFICER SCULLY: Yes, please.

MS. ROAM: So I offered 1107, and I understand that it says right in the beginning, "In a criminal action." However, it says in subsection (b) that:

"Expert opinion testimony on intimate partner battering and its effects shall not be considered a new scientific technique whose reliability is unproven."

And then it goes on and it says that:

1.3

2.0

2.5

"This section is intended as a rule of evidence only."

So clearly the Legislature recognizes that in cases involving domestic violence that the trier of fact could be confused by behaviors that are counterintuitive.

And so as you pointed out, we have who is a trained deputy sheriff. She has received training in domestic abuse. As you said, she must be a strong woman because of that.

I think there are certain expectations that you would have as far as action or inaction, and so when you have someone that the -- that they have demonstrated -- they have recognized patterns of behavior when a woman is subjected long term to control, isolation and other types of mental abuse which escalated -- ultimately did escalate to physical.

The case law says that even one act of domestic violence constitutes domestic violence. So the fact that we only have one actual physical act of domestic violence in September, well, we have a history of saying she tried to break up with him. This is the classic cycle of domestic violence abuse where you have the abuser exerting control, and it reaches a breaking point, and then there's the honeymoon, the getting back together, and the cycle

1 goes over and over again. 2 And I believe that the evidence here in the 3 statements of , both in hearing and to El Segundo Police and during her IAB, indicate her state 4 5 of mind, why she was afraid to speak out, why she 6 didn't -- for a year and a half she feels trapped in this 7 relationship because she wants him to lose interest in her 8 and move on. She's concerned about the repercussions if she breaks up with him. 10 HEARING OFFICER SCULLY: Didn't she testify to 11 t.hat.? 12 MS. ROAM: She did. 1.3 HEARING OFFICER SCULLY: So what's the need --14 how is an expert going to help me? 15 MS. ROAM: Because she's going to come in and 16 point out other things in the case file that you may or 17 may not have keyed in on that are consistent that will 18 help you make a determination as to the facts here. 19 HEARING OFFICER SCULLY: Well, 1107 of the 2.0 Evidence Code says in subsection (e): "This section shall be known as 21 22 and be cited as the, " quote, "expert 23 witness testimony on intimate partner 24 battering and its effects." 2.5 MS. ROAM: Okay.

1 HEARING OFFICER SCULLY: So the -- this section, 2 that's what it's called, but it's only applicable in a criminal action. It's not applicable in a noncriminal 3 action. 4 5 MS. ROAM: Okay. So --HEARING OFFICER SCULLY: So we can probably just 6 7 say let's put this aside, and the issue becomes, under the 8 other Evidence Code provisions, is an expert witness 9 testimony going help in this case? And, I tell you what. Maybe what we can do is do 10 11 a -- because I think there's some good objections to it on 12 the Appellant's side, but maybe provisionally take the 1.3 testimony and subject to a motion to strike if it's not 14 sufficiently -- has sufficient foundation and relevant and 15 reliable. MR. GOLDFEDER: Well, there is no foundation on 16 17 the basis of the Evidence Code itself. It's only in a 18 criminal action. HEARING OFFICER SCULLY: Well, under 1107, but 19 2.0 there's also --21 MS. ROAM: 801. 22 HEARING OFFICER SCULLY: -- the expert testimony 23 under 801 --24 MR. GOLDFEDER: 801 is a separate section for 2.5 just expert witnesses and foundation for that, but now you

have an expert witness talking about, you know, this issue as far as, you know, behavior of victims of domestic violence. So you could have an expert witness under 801, provided they meet the criteria, which is a criminal case.

1.3

2.0

2.5

There's no criminal case here. The cases that are appended to Sergeant's letter there are both criminal cases that are dealing with a Flannel defense for imperfect defense to a murder charge. You can only bring that evidence in of domestic violence in a criminal action. It says it in the first paragraph.

So everything that Counsel is -- or actually, that Sergeant is sitting there trying to wish into existence, the state legislature does not allow under 1107.

So I will stipulate there are people that can testify under 801 as experts for all sorts of things. We have an expert doctor, we have an expert human factors engineer, but if they're going to be testifying under this particular category of domestic abuse and violence, now they're couched under the parameters of 1107, and it's not a criminal action.

HEARING OFFICER SCULLY: Well, but see, the way

I'm looking at 1107 is it doesn't apply, so we don't even

need to talk about it because it does not apply. We don't

have -- the circumstances that we're dealing with do not

apply to 1107 and vice versa, but we still have to look at, is this expert testimony admissible under 801. I'm not sure it is.

2.0

I think that the criteria has to be that it has to be reasonably helpful to the trier of fact and that there has to be, you know, a recognized scientific method or process of something valid, not just her opinion now, without any valid medical or psychological foundation.

Now, she's never examined the alleged victim, so it may be that, you know, her testimony will just not even be accepted at all because she's never examined the alleged victim. And as for theories of how certain domestic violence victims behave, I don't know if that foundation is there or not. There might be other explanations for behavior. I mean, you know, I don't know.

MS. ROAM: Well, I think that your inclination to allow her testimony subject to a motion to strike, I think that's fair. Then you can hear what she has to say. If you determine there is not a sufficient foundation or relevance to her testimony, then we strike it, but I -- 801 says if the expert -- the subject is sufficiently beyond common experience, that the opinion of the expert would assist the trier of fact.

I think by your own statement at the very

beginning of this about being a strong woman in law enforcement, expectations of how she should respond, I think that's exactly why an expert witness is necessary here. Her testimony could be very helpful, or you might hear it and you might determine to give it no weight, but I think --

2.5

the testimony, for example, to say that is not responsible for her conduct, she's just a helpless victim, and a hundred percent of the responsibility of the disfunction of the relationship belongs to Deputy Mandoyan and zero to her, you know, you're right. I'm resistant to that. And I don't know that this expert witness is going to be able to really address that. I'm willing to listen to her, though.

MR. GOLDFEDER: Well, here's how it generally comes up, your Honor, in a criminal matter. Let's say the purported victim doesn't want to testify. So then let's say, if the prosecution is going to petition the court for transactional immunity, then that's the predicate basis to bring a person in to testify about, you know, domestic violence, because now the person or purported victim has become recalcitrant in that case. So here, we don't have even have that.

And I'm even putting aside the fact this is not

even relevant because it doesn't even meet the thresholds under 1107. But short of somebody not, you know, coming in and talking about, you know, these allegations that are being made here, then this testimony from is nothing more than trying to bolster the credibility of a witness, and she's never even interviewed this person.

2.0

2.5

So what we're going to really wind up doing is, you know, having someone come here and talk about what their opinions about what domestic violence is with no factual basis on an evidentiary level for a 402 Hearing, because we don't even have the threshold requirement of an individual that said, I fell into the stove, or, I tripped down the stairs, or somebody that doesn't want to come into court and you had to bring them under a, you know, arrest warrant, because now they're not cooperating.

So in this case, all this testimony is is just a -- it's a blatant way to try to bolster someone's credibility, and there's really no factual underpinnings for this to even go through this exercise.

And I don't know how much money the Department spent on this individual, but it would be no different than if we stipulated that, here's a brochure about what domestic violence is. So it's irrelevant because this person hasn't interviewed anyone.

This individual, , came here and made

her allegations, stale as they are, to both the

District Attorney's office and the El Segundo Police

Department, and now this is just an obvious effort to try

to puff up somebody's credibility when they've already

come here and testified.

2.0

2.5

And for to come here and say, She's a domestic violence victim, it's just -- it's not even cumulative. It's not even relevant at that point. It's strictly to say, Hey, here's a little cycle of violence. Here's the window of opportunity. She's not in a relationship with, you know, Mr. Mandoyan, where he's, you know, providing all the income and now she has a reason to change her story, she's going to lose her kids, she's going to lose her livelihood, you know, her domestic partner, or her spouse, significant other.

It's really nothing more than just, Our witness didn't do well, other people came here and provided their opinions about her, and now we have to try to, you know, wave the flag of domestic violence here when the factual underpinnings are not even present, not even close.

And that's why this, you know, testimony is relegated to criminal courts, because that is the basis for any kind of 402 Hearing, is if a witness decides, I don't want to testify. So then they go the route with transactional immunity and then they could actually put

the officer back on the stand to talk about, here's what was said in the report over some hearsay objections.

2.0

2.3

2.5

And then you can have an individual come in to talk about, This is how domestic violence reacts from, you know, long-time suffering, battering, things of that nature, none of which is present here. Not even a scintilla of that is present.

Let's say she never came here and testified.

Even putting aside my argument that it's not available and allowed outside of criminal court, that would have been required to actually introduce this evidence.

Irrespective of weight, it doesn't even get inside the stadium, because she came here referring to the purported victim, ______, and told her story. And there was no change of her story, she said what she said, and now domestic violence doesn't fit the bill here.

And let's say if somebody was a defendant in a case and that individual was claiming, I stabbed my husband 15 times while they were sleeping because of a lifetime domestic violence, then the court has to make a determination if there is a factual basis for that to even have that testimony come in as part of an affirmative defense under, you know, CALCRIM instructions.

Those would be Flannel issues as to whether or not there was even any basis for a voluntary manslaughter,

for example, in a murder case, mitigating factors. She's here, she's testified. Nobody prevented her from testifying. So now it's just a -- but we need to bolster her credibility, and that's impermissible witness vouching.

1.3

2.0

2.5

HEARING OFFICER SCULLY: Well, then there's also an issue of not just bolstering your credibility, but actually, you know, an expert saying, I've examined her, and I've examined the evidence anyway, and she completely fits the profile of a domestic violence victim, and what's the inference of that? Well, that there was domestic violence in this case.

So it's like it's trying to use somebody who doesn't have personal knowledge really to bolster the Department's theory of the case. Not only bolster her — not only explain why she might appear to be in some ways not credible but she really is, but also to say that, you know, this is independent corroborative evidence that there was domestic violence in this case, and I don't think that that's proper.

But this is what I'm going to do. I'm going to take it under submission, I'm going to study it, I want to read the documents and the case law and maybe any other -- you know, look at the Evidence Code and we'll have to -- you know, I'll tell you my decision on it Friday morning,

1 so -- I mean, there is nothing I can do --2 MS. ROAM: May I make a parting shot? HEARING OFFICER SCULLY: Sure, why not. 3 MS. ROAM: Okay. So 801 allows expert testimony 4 when the subject matter is beyond common experience. 5 purpose for testifying is not to say that 6 7 domestic violence happened. It's for her to point out 8 from this investigation things that she sees in both 's conduct and Caren Mandoyan's conduct that fit that recognized pattern of behavior when there is 10 11 domestic violence or this battered -- not battered. I 12 don't want to use that. Intimate partner --1.3 HEARING OFFICER SCULLY: Just, just, just --14 MS. ROAM: -- battering or whatever, but that's 15 the purpose of her to testify. It's not to tell you that it happened, it's to 16 17 point out things and explain the foundation for why those behaviors are recognized, and to help you to then 18 understand either action or inaction that may not make 19 2.0 sense to you. 21 MR. GOLDFEDER: Now, Counsel has just gone ahead 22 made my argument for me, because on section (a) it 23 actually says that: 24 "Expert testimony is admissible 2.5 except when offering against a criminal

1 defendant to prove the occurrence of the 2 act or acts of abuse which form the basis of the criminal charge." 3 And that's exactly what she's saying 4 5 is going to come here and testify, that, I looked at all 6 this, this is classic domestic violence. 7 Two District Attorneys with 60 years of 8 experience said there is nothing here, and now Sergeant Roam wants to rewrite the Evidence Code to try to 10 bolster the credibility of her witness when that's exactly 11 what the testimony from is going to formulate, 12 which violates subsection (a), because now that's formulating a foundation that the act or acts of abuse 13 14 occurred. And there is no basis for a criminal allegation 15 here because nothing has ever been filed. 16 So the testimony and what she's going to talk about now is classic 402, that, you know, never will make 17 18 it in front of the jury. 19 HEARING OFFICER SCULLY: Okay. So I will take 2.0 this under submission, and I guess that means have her 21 here Friday morning. 22 MS. ROAM: 9:00 o'clock, yes. 23 HEARING OFFICER SCULLY: And I will make a 24 decision then. MR. GOLDFEDER: Thank you, your Honor. 2.5

1	HEARING OFFICER SCULLY: All right. Thank you.
2	Off the record.
3	(Proceedings adjourned at 4:36 p.m.)
4	
5	
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	

1 HEARING REPORTER'S CERTIFICATE 2 3 I, Amanda Karmann, Hearing Reporter in and for the State of California, do hereby certify: 4 That the foregoing transcript of proceedings was 5 6 taken before me at the time and place set forth, that the 7 testimony and proceedings were reported stenographically by me and later transcribed by computer-aided 8 transcription under my direction and supervision, that the 10 foregoing is a true record of the testimony and 11 proceedings taken at that time. 12 I further certify that I am in no way interested in the outcome of said action. 13 14 I have hereunto subscribed my name this 19th day 15 of October, 2017. 16 17 18 19 AMANDA KARMANN 2.0 HEARING REPORTER 21 22 2.3 2.4 25

		1	•
T	1:43 _[1] - 167:14	139:1, 139:15, 139:19, 139:24, 140:17, 141:21,	27 [6] - 1:18, 2:19, 6:1, 94:24, 97:8, 138:14
'13 [1] - 198:6	2	144:14, 144:18, 145:7,	27th [5] - 15:9, 96:19, 127:1,
'14 [2] - 167:10, 198:7		147:25, 148:24, 151:16,	130:23, 138:25
	2 [4] - 37:10, 42:23, 43:2,	152:19, 157:2, 157:15,	28 [1] - 97:8
0	84:18	158:8, 158:16, 161:23,	28th [4] - 15:10, 96:19, 97:5,
0200 (1) 115:11	20 [1] - 151:16	162:5, 162:12, 163:19,	167:14
0300 [1] - 115:14	200 [1] - 4:11	172:17, 188:5, 204:25,	29 [2] - 42:24, 63:22
0318 [1] - 163:20	2001 [2] - 13:12, 202:22	206:6, 216:6, 222:16	29th [6] - 15:10, 38:14,
0345 [3] - 125:21, 137:25,	2002 [1] - 191:7	2016 [11] - 1:6, 2:6, 12:4,	42:18, 42:25, 43:9, 43:16
163:20	2006 [1] - 10:7	13:1, 13:3, 13:4, 13:24,	2:00 [3] - 102:22, 102:23,
4	2007 [1] - 11:17	16:5, 16:12, 16:17, 160:4	195:5
1	2008 [1] - 11:17	2017 [13] - 1:18, 2:19, 6:1,	2nd [1] - 173:7
1 [3] - 37:22, 42:14, 42:25	2010 [2] - 13:12, 202:24	72:16, 72:25, 73:20, 92:2,	2114[1] 170.7
10 [2] - 156:5, 156:11	2013 [11] - 10:20, 153:16,	92:16, 108:10, 109:25,	3
101 [2] - 3:5, 5:15	153:22, 154:3, 154:6,	117:17, 160:16, 253:15	3
1021 [2] - 43:4, 43:8	154:23, 155:2, 189:5,	202 [1] - 4:12	3 [4] - 19:15, 37:10, 96:16,
106 [1] - 5:16	192:6, 203:6, 216:15	205 [1] - 5:20	224:3
10:25 [1] - 69:9	2014 [59] - 15:9, 15:21,	20th [6] - 95:1, 143:12,	31 [1] - 63:23
11 [1] - 203:2	17:13, 20:2, 29:9, 29:12,	148:24, 152:19, 158:8,	310-374-7011 [1] - 3:11
1107 [15] - 234:8, 236:2,	65:15, 81:21, 82:8, 82:10,	158:16	32 [5] - 5:5, 180:17, 215:12,
236:14, 236:24, 237:2,	82:13, 87:1, 87:9, 87:20,	21 [4] - 178:2, 180:7, 180:11,	215:13, 224:2
	88:1, 88:10, 93:6, 94:5,	181:6	323-890-5413 [1] - 3:6
237:19, 237:23, 239:19,	94:24, 95:1, 95:10, 96:10,	213 [1] - 4:12	33 [1] - 158:20
241:19, 242:19, 243:14,	96:19, 96:24, 97:5, 97:8,	• •	34 [1] - 4:5
243:20, 243:23, 244:1,	97:20, 97:22, 98:2, 98:13,	213-392 [1] - 105:14	352 [1] - 238:1
246:2	98:16, 98:19, 99:6, 99:13,	213-392-4504 [1] - 106:12	36 [1] - 5:11
114 [1] - 5:17	99:17, 101:3, 101:6,	215 [1] - 5:5	3:00 [1] - 102:24
11:00 [1] - 69:23	103:25, 104:2, 107:13,	21st [7] - 107:17, 173:9,	3:14 [3] - 106:18, 171:25,
11:56 [1] - 171:25	107:18, 107:20, 107:23,	174:4, 177:20, 182:18,	172:1
11:59 [1] - 94:25	108:13, 109:20, 110:14,	183:2, 188:4	3:18 [8] - 105:8, 106:24,
11th [1] - 191:7	112:17, 120:13, 127:1,	22 [5] - 35:18, 37:1, 37:6,	107:7, 108:15, 110:2,
12 [2] - 156:15, 203:3	127:4, 130:23, 134:14,	37:9, 173:23	110:21, 112:18, 125:25
12/27 [1] - 165:20	138:14, 138:25, 139:14,	23 [3] - 157:21, 158:3, 173:24	3:44 [1] - 111:12
12/27/14 [4] - 164:21, 164:25,	163:8, 168:19, 192:7	23rd [8] - 83:16, 86:7, 97:17,	3:45 [1] - 126:8
165:13, 166:25	2015 [113] - 13:2, 15:9, 15:10,	98:23, 120:17, 120:22,	3.43[1] - 120.8 3rd [13] - 114:9, 115:6,
12/28 [1] - 166:10	15:22, 16:17, 16:25, 17:13,	121:11, 222:15	115:25, 116:5, 116:12,
12:00 [1] - 117:1	29:12, 38:14, 42:18, 42:24,	24 [1] - 113:19	161:23, 162:5, 162:12,
12:38 [1] - 95:1	42:25, 43:9, 43:16, 47:21,	24th [2] - 113:23, 160:4	204:25, 206:6, 222:19,
13 [1] - 190:7	63:22, 63:23, 65:15, 65:18,	25 [1] - 111:11	222:20, 222:22
14 [11] - 1:6, 2:6, 121:1,	83:16, 86:7, 87:3, 97:17,	25th [15] - 15:9, 72:15, 72:16,	222.20, 222.22
121:13, 126:17, 127:7,	98:23, 99:24, 100:3,	72:17, 94:5, 96:24, 99:13,	4
127:20, 129:25, 133:24,	100:25, 101:9, 102:3,	102:3, 102:8, 103:13,	4
134:9, 145:7	102:8, 103:10, 103:17,	107:13, 108:22, 109:10,	4 [10] - 19:14, 19:16, 22:4,
14th [9] - 118:2, 120:20,	103:21, 105:4, 105:12,	109:15, 134:14	37:13, 97:1, 150:20, 151:7,
122:21, 129:11, 131:23,	106:11, 107:5, 107:17,	26 [15] - 73:20, 92:16, 105:8,	151:10, 165:4, 172:14
132:4, 138:4, 138:18,	108:22, 109:10, 109:16,	107:8, 108:10, 117:17,	400 [1] - 3:10
138:24	110:2, 110:7, 112:7,	124:16, 136:1, 136:2,	401 [1] - 237:25
15 [2] - 190:7, 248:19	112:23, 113:19, 113:23,	136:20, 136:23, 137:25,	402 [4] - 238:9, 246:10,
16-276 [3] - 1:9, 2:9, 6:6	114:9, 115:6, 115:25,	139:1, 160:16, 171:16	247:23, 251:17
168 [1] - 4:7	116:6, 116:12, 118:2,	26-minute [9] - 106:25,	4504 [1] - 105:16
17 [1] - 172:17	120:13, 120:17, 120:22,	107:7, 108:16, 110:1,	4900 [1] - 3:5
1700 [2] - 115:14, 115:17	121:1, 121:11, 121:13,	111:1, 111:9, 111:18,	4:00 [4] - 102:22, 102:23,
181 [1] - 5:18	122:19, 122:21, 123:19,	136:11, 163:24	102:24, 232:13
188 [1] - 4:7	124:16, 124:21, 125:13,	26th [19] - 72:25, 92:2,	4:07 [1] - 111:12
191 [1] - 4:11	125:18, 125:20, 126:9,	103:13, 105:4, 105:8,	4:13 [1] - 172:1
197 [1] - 4:11	126:17, 127:7, 127:20,	109:25, 110:2, 110:6,	4:24 [1] - 42:25
1996 [1] - 202:20	127:21, 127:25, 129:11,	112:7, 123:19, 125:13,	
19th [1] - 253:14	129:25, 131:23, 132:4,	125:20, 126:9, 130:24,	4:30 [1] - 232:13
1:00 [3] - 117:2, 117:6,	133:24, 134:9, 137:25,	135:21, 136:11, 163:19,	4:36 [2] - 2:19, 252:3
166:10	138:4, 138:18, 138:24,	182:7, 183:2	4th [2] - 127:21, 127:25
100.10	100.1, 100.10, 100.24,		

62:3, 62:22, 63:2, 94:14, 150:19, 151:7, 155:25, 156:11, 156:15, 157:21, 158:3, 158:19, 165:5, 173:22, 178:3, 178:24 **50** [2] - 36:12, 36:15 **500** [1] - 2:17 **52** [2] - 36:10, 36:15 528 [1] - 2:18 **53** [7] - 5:11, 36:17, 36:19, 36:25, 42:14, 80:11 **54** [5] - 5:12, 80:3, 80:5, 84:20, 97:15 **55** [6] - 5:13, 89:18, 89:19, 89:24, 92:7, 184:11 **56** [11] - 5:14, 94:13, 94:14, 94:16, 94:24, 96:13, 97:2, 99:6, 165:16, 165:18 **57** [7] - 5:15, 63:19, 80:13, 101:20, 101:22, 102:8, 109:16 **58** [7] - 5:16, 105:21, 106:5, 106:7, 106:14, 111:13, 170:25 **59** [5] - 5:17, 114:15, 114:17, 114:24, 180:13

6

5:00 [1] - 115:17

5:19 [1] - 116:12

6 [5] - 63:4, 150:7, 150:8, 165:4, 172:9 60 [8] - 5:18, 180:13, 180:20, 181:1, 181:2, 205:5, 205:11, 251:7 61 [7] - 5:20, 205:7, 205:8, 205:12, 205:17, 212:23, 224:17 63 [1] - 4:5 68 [1] - 4:6 6:00 [1] - 195:6 6:03 [1] - 42:24 6th [1] - 3:10

7

7 [5] - 51:9, 51:14, 51:18, 51:25, 52:3 **71** [1] - 4:7

8

8 [12] - 10:25, 19:13, 51:11, 51:12, 51:13, 51:18, 56:21, 56:22, 56:23, 57:22, 61:25 **80** [1] - 5:12

80 [1] - 5:12 **801** [8] - 242:21, 242:23, 242:24, 243:3, 243:16, 244:2, 244:22, 250:4 **89** [1] - 5:13

9

9 [3] - 4:5, 173:8, 173:13 90040 [1] - 3:6 90246 [1] - 3:11 911 [1] - 133:21 94 [1] - 5:14 95 [1] - 115:12 95J [1] - 38:19 9:00 [2] - 108:22, 251:22 9:12 [2] - 102:7, 109:16 9:14 [2] - 2:18, 6:2 9th [1] - 15:9

Α

[1] - 9:4 **a.m** [15] - 2:18, 6:2, 42:25, 95:1, 102:23, 106:18, 106:24, 111:12, 166:10, 171:25, 172:1, 195:6 a.m./p.m [1] - 115:17 ability [2] - 86:23, 197:13 **able** [10] - 8:1, 19:8, 60:20, 64:22, 65:1, 160:21, 160:25, 186:25, 238:5, 245:14 abrupt [1] - 18:18 absolutely [6] - 14:14, 64:4, 86:21, 181:5, 218:25, 235:12 abuse [10] - 234:2, 235:20, 236:21, 239:13, 240:9, 240:16, 240:23, 243:19, 251:2, 251:13 abuser [2] - 238:15, 240:23 academy [1] - 121:24 Academy [3] - 40:13, 40:16, 191.8 accent [1] - 27:3 accept [4] - 15:6, 67:15. 67:18, 67:21 accepted [2] - 38:8, 244:11 accepting [1] - 86:15 access [3] - 160:19, 160:21, 160:25 accidentally [1] - 33:14 according [4] - 85:2, 107:14, 107:16, 223:7 account [1] - 160:18 accurate [2] - 35:19, 161:24 accurately [1] - 86:16 accused [1] - 162:20 acknowledging [2] - 100:17, 221:6

act [6] - 200:25, 236:21,

240:18, 240:20, 251:2, 251.13 action [13] - 170:11, 236:15, 236:24, 237:3, 239:21, 240:12, 242:3, 242:4, 242:18, 243:10, 243:21, 250:19, 253:13 acts [4] - 211:25, 236:21, 251:2, 251:13 actual [7] - 77:13, 77:20, 115:3, 207:14, 236:13, 238:21, 240:20 additional [1] - 180:5 address [5] - 7:20, 37:15, 37:16, 239:8, 245:14 adjourned [1] - 252:3 adjust [1] - 106:2 administration [1] - 230:11 administrative [1] - 230:11 admissible [4] - 21:23, 239:15, 244:2, 250:24 admission [1] - 22:2 admitted [2] - 114:6, 140:10 advance [2] - 50:12, 151:19 advised [2] - 130:20, 230:15 advises [1] - 132:5 Advocacy [1] - 3:5 advocate [1] - 180:4 **Affairs** [13] - 11:3, 50:7, 57:9, 115:24, 132:13, 159:5, 159:9, 159:18, 159:22, 195:25, 196:3, 196:17, 213:11 affect [1] - 200:2 affiliation [1] - 217:5 afraid [1] - 241:5 afternoon [3] - 70:12, 190:5, 231:6 agencies [1] - 189:15 agency [7] - 99:19, 120:14, 131:5, 154:10, 156:21, 175:6, 218:18 **ago** [10] - 22:9, 33:1, 59:21, 72:13, 75:16, 75:17, 133:13, 147:19 agree [9] - 21:21, 100:23, 108:2, 109:9, 109:11, 138:24, 141:14, 146:5, 169:23 agreement [3] - 128:19, 129:5, 129:7 ahead [5] - 27:22, 29:20, 71:2, 225:18, 250:21 ahold [1] - 124:19 aided [1] - 253:8

251:14 allegations [11] - 179:20, 198:17, 200:19, 210:20, 211:2. 211:3. 211:4. 212:15, 235:18, 246:3, 247:1 alleged [8] - 126:25, 226:4, 238:15, 238:16, 238:19, 244:9, 244:12 allegedly [1] - 130:24 alleging [5] - 226:16, 226:17, 227:12, 227:15, 228:6 allow [7] - 29:18, 149:11, 170:5, 226:19, 237:2, 243:13, 244:18 allowed [19] - 22:25, 88:21, 89:2, 89:12, 90:21, 91:2, 91:18, 92:4, 92:12, 123:7, 141:8, 157:12, 185:3, 220:3, 236:2, 236:18, 237:5, 238:7, 248:10 allows [1] - 250:4 almost [1] - 165:21 alone [12] - 17:24, 119:19, 124:22, 124:23, 137:3, 137:13, 146:8, 174:15, 174:18, 174:24, 174:25, 217:8 aloof [1] - 187:8 **ALS** [2] - 128:21, 128:23 [2] - 2:21, 253:3 [2] - 1:24, 253:19 [1] - 71:7 [81] - 4:7, 5:18, 11:9, 11:10, 14:11, 15:14, 17:14, 18:11, 20:8, 20:16, 21:7, 24:23, 25:1, 25:3, 26:15, 27:1, 27:4, 28:11, 28:21, 29:4, 29:12, 31:1, 31:2, 31:16, 31:22, 32:1, 32:2, 32:6, 33:8, 33:13, 45:14, 49:11, 51:5, 52:17, 52:23, 53:1, 53:11, 53:17, 53:22, 53:25, 54:1, 54:3, 54:23, 55:3, 58:25, 59:2, 59:13, 59:15, 59:23, 60:20, 60:25, 61:13, 61:22, 63:7, 68:12, 70:7, 192:2, 193:3, 193:7, 193:15, 194:13, 196:5, 196:9, 200:19, 208:10, 214:2, 214:22, 215:3, 223:8, 223:12, 223:16, 225:2, 225:24, 240:7, 240:21, 241:3, 245:1, 245:8, 246:25, 248:14, 250:9

[1] - 37:16

ambiguous [1] - 146:2

[2] - 27:25, 224:8

allegation [14] - 29:17,

174:19, 188:20, 189:4,

196:12, 197:1, 198:22,

199:8, 199:10, 220:10,

223:12, 230:8, 233:14,

amend [1] - 237:2 amicable [1] - 99:14 amount [2] - 36:1, 221:19 analyze [1] - 170:18 **ANGELES** [2] - 1:2, 2:2 Angeles [8] - 1:17, 2:17, 6:1, 82:15, 129:1, 191:15, 203:16, 206:7 angry [2] - 66:21, 66:22 ankle [1] - 217:19 anonymous [26] - 52:14, 52:21, 53:7, 53:22, 54:3, 54:5, 54:22, 56:19, 57:5, 74:9, 74:13, 77:18, 83:6, 98:24, 99:21, 118:6, 118:19, 121:17, 122:18, 124:25, 139:5, 141:20, 142:3, 162:8, 177:13, 177:17 anonymously [2] - 53:13, 53:17 answer [23] - 9:11, 16:12, 23:1, 23:2, 27:7, 27:12, 27:21, 35:11, 35:12, 43:22, 44:2, 56:6, 62:19, 80:23, 89:8, 123:7, 124:7, 124:9, 124:11, 141:7, 149:15, 186:1, 224:3 answered [7] - 45:3, 49:5, 55:12, 85:25, 153:9, 171:15, 185:24 answering [3] - 9:9, 9:12, 57:1 answers [1] - 149:12 anticipating [1] - 238:25 anytime [3] - 29:8, 46:22, 184:5 anyway [3] - 164:20, 165:11, 249.9 apartment [27] - 21:10, 93:17, 134:24, 178:9, 178:22, 179:6, 182:8, 182:12, 183:1, 199:12, 199:15, 199:18, 200:24, 223:21, 223:22, 223:23, 225:3, 225:5, 225:6, 225:9, 225:25, 226:7, 226:10, 226:11, 226:14, 226:18, 227:14 apologize [7] - 51:24, 55:9, 55:17, 72:7, 83:12, 119:8, apologized [2] - 52:24, 55:20 apologizing [1] - 56:12 app [2] - 160:21, 160:24 appear [5] - 11:2, 127:16, 173:15, 235:6, 249:16 appearance [5] - 72:19, 95:14, 160:16, 162:3, 210:18

APPEARANCES [1] - 3:1 **APPELLANT** [2] - 1:8, 2:8 Appellant [44] - 3:9, 18:24, 28:24, 29:13, 36:8, 36:9, 36:12, 101:21, 114:16, 168:20, 169:16, 169:19, 171:11, 172:11, 174:5, 174:8, 174:12, 176:7, 182:7, 182:12, 183:1, 184:25, 185:3, 185:7, 190:15, 197:24, 198:24, 199:11, 199:17, 200:1, 200:5, 200:9, 202:2, 216:22, 219:5, 220:9, 222:17, 222:23, 225:2, 225:8, 225:23, 226:9, 226:13 Appellant's [40] - 36:19, 36:25, 63:19, 80:3, 80:5, 84:20, 89:18, 89:19, 89:24, 92:7, 94:14, 94:16, 94:24, 96:13, 97:2, 97:15, 99:6, 101:22, 102:8, 105:21, 106:7, 106:14, 109:16, 111:13, 114:17, 114:24, 170:25, 180:22, 181:2, 184:11, 190:2, 198:14, 205:5, 205:12, 205:17, 212:23, 216:20, 218:2, 224:17, 242:12 **APPELLANT'S** [2] - 4:9, 5:9 Appellants [1] - 94:13 appended [1] - 243:6 Apple [2] - 160:18, 160:19 applicable [2] - 242:2, 242:3 application [18] - 84:15, 85:8, 85:19, 113:13, 125:15, 126:12, 126:17, 131:2, 137:24, 138:17, 139:23, 140:21, 141:16, 178:2, 178:14, 178:20, 205:11, 218:24 Application [1] - 5:18 applied [4] - 85:14, 86:11, 86:25. 178:6 apply [3] - 243:23, 243:24, 244:1 **applying** [1] - 86:23 **appointment** [1] - 151:19 appreciate [4] - 130:11, 181:11, 221:24, 231:4 apprehension [1] - 140:24 approach [2] - 207:9, 223:18 approached [1] - 223:18 appropriate [1] - 218:4 appropriately [1] - 175:13 approve [1] - 220:14 approved [1] - 46:8

approximate [5] - 103:7,

166:20, 167:2, 167:5,

186:3 167:11 237:19 113:15 221.4 213:8 assistant [1] - 30:22 assisted [3] - 42:12, 44:11, 47:7

approximated [5] - 166:14, 129:1 166:22, 167:6, 167:7, 222:5 **April** [3] - 12:4, 13:1, 13:2 area [2] - 206:10, 234:10 arena [3] - 237:5, 237:10, 113:10 arguing [2] - 43:19, 238:7 argument [9] - 169:25, 170:4, 170:6, 206:5, 224:12, 224:14, 225:4, 248:9, 250:22 argumentative [6] - 27:11, 27:14, 27:19, 40:7, 40:10, arise [1] - 204:18 arm's [1] - 17:7 Armenian [1] - 24:5 **Armenians** [1] - 24:8 [3] - 161:15, 162:8, 16²:21 225:24 arrest [1] - 246:15 arresting [1] - 42:4 arrive [1] - 121:8 [32] - 4:5, 6:8, 6:16, 7:4, 8:13, 8:16, 9:3, 9:25, 227:19 13:17, 14:17, 22:15, 24:5, 37:3, 43:19, 51:24, 56:3, 62:25, 63:18, 69:7, 74:16, 74:22, 75:3, 75:6, 75:7, 75:11, 76:15, 77:9, 77:12, 77:14, 78:4, 120:7, 120:10 [1] - 8:20 127:25 ascertain [2] - 35:25, 109:23 ascertained [1] - 74:12 aside [5] - 228:11, 228:15, 242:7, 245:25, 248:9 assaulted [1] - 235:1 43:8 assessment [1] - 198:13 assigned [13] - 10:10, 10:18, 12:1, 12:15, 39:1, 102:3, 115:5, 202:23, 203:2, 203:7, 214:9, 216:14, assignment [6] - 10:8, 84:7, 129:18, 206:9, 206:15, assist [7] - 11:14, 45:1, 45:10, 59:20, 126:14, 193:19, 244:24 assistance [7] - 45:18, 46:19, 87:13, 88:2, 127:9, 201:8, 231:3

Association [2] - 128:21, association [2] - 217:24, assuming [2] - 13:1, 182:18 assumption [1] - 112:1 at-the-time [2] - 113:1, ate [1] - 195:2 attach [1] - 179:16 attached [4] - 47:5, 179:19, 234:8, 236:3 attachment [1] - 179:18 attack [2] - 217:20, 219:2 attempt [2] - 199:17, 235:4 attempted [11] - 18:8, 169:6, 171:11, 178:8, 199:11, 223:20, 223:22, 226:7, 226:17, 227:13 attempting [5] - 20:23, 169:16, 178:21, 199:14, attention [12] - 7:21, 51:4, 63:18, 144:12, 170:24, 172:8, 172:14, 172:17, 184:10, 186:22, 223:25, attorney [1] - 129:4 Attorney [2] - 168:13, 236:13 Attorney's [1] - 247:2 attorneys [1] - 9:10 Attorneys [2] - 237:8, 251:7 August [3] - 10:20, 127:21, authored [4] - 205:25, 206:2, 206:3, 216:12 available [1] - 248:9 Avenue [4] - 2:17, 3:5, 43:4, aware [11] - 25:3, 54:11, 54:15, 74:19, 74:21, 78:24, 78:25, 86:23, 144:8, 182:11, 214:22 awesome [1] - 152:11

В

babe [1] - 165:22 background [1] - 228:21 bad [10] - 12:18, 22:3, 22:5, 22:6, 22:9, 219:8, 220:2, 220:13, 222:2 badge [5] - 196:24, 200:6, 200:11, 200:21, 201:1 Bag [2] - 197:8, 197:10 Bail [2] - 197:8, 197:10 balcony [3] - 18:7, 168:6, 169.6 **ball** [1] - 183:6 [2] - 189:2, 189:11

assisting [4] - 39:3, 44:12,

associated [1] - 221:9

45:23, 58:13

base [2] - 163:1, 236:22 based [19] - 59:23, 79:24, 81:15, 130:22, 196:20, 197:10, 198:14, 199:20, 204:10, 209:23, 211:5, 211:24, 212:22, 213:4, 219:13, 222:25, 223:17, 224:16, 227:15 baseless [2] - 211:22, 219:2 **basic** [1] - 72:8 basing [1] - 223:1 basis [20] - 29:17, 34:9, 168:10, 206:1, 211:4, 217:1, 219:12, 220:5, 237:9, 237:17, 238:2, 238:7, 242:17, 245:20, 246:10, 247:22, 248:21, 248:25, 251:2, 251:14 Bates [2] - 165:6, 172:15 Bates-stamped [2] - 165:6, 172:15 bathroom [1] - 171:11 battered [5] - 234:16, 234:19, 234:20, 250:11 batterer [1] - 238:15 battering [7] - 234:22, 236:4, 239:11, 239:23, 241:24, 248:5, 250:14 Beach [2] - 188:24, 189:7 beat [1] - 233:8 became [4] - 23:9, 65:24, 66:16, 66:21 become [7] - 45:17, 54:15, 66:22, 203:19, 203:25, 204:3, 245:23 becomes [1] - 242:7 **BEFORE** [2] - 1:1, 2:1 befriend [1] - 24:11 began [1] - 24:13 begin [2] - 70:9, 177:12 beginning [9] - 2:18, 13:3, 13:4, 13:22, 32:23, 66:3, 148:3, 239:20, 245:1 behalf [5] - 8:21, 71:8, 79:2, 190:15, 202:2 behave [1] - 244:13 behavior [8] - 76:22, 187:1, 187:4, 234:1, 240:14, 243:2, 244:15, 250:10 behaviors [4] - 234:6, 239:13, 240:6, 250:18 behind [4] - 12:18, 124:20, 196:18, 235:17 belief [1] - 83:2 beliefs [2] - 239:12, 239:13 belong [1] - 118:11 belongs [1] - 245:11 below [5] - 91:1, 91:10, 92:18, 110:24, 179:13

best [2] - 50:22, 225:11

better [11] - 45:16, 45:17, 47:3, 47:5, 48:6, 48:22, 64:8, 64:9, 64:10, 64:12, 195:10 between [15] - 18:12, 28:6, 67:8, 67:10, 67:20, 82:11, 87:25, 89:25, 111:11, 121:12, 156:17, 171:24, 172:1, 184:5, 229:1 beverage [1] - 163:11 beyond [4] - 148:9, 201:4, 244:23, 250:5 **big** [9] - 52:11, 52:15, 53:7, 150:19, 157:21, 159:1, 175:21, 175:24, 176:2 bigger [1] - 176:4 **bill** [3] - 111:23, 171:3, 248:16 billions [1] - 90:7 binder [8] - 10:24, 51:9, 51:13, 150:19, 150:25, 156:6, 156:17, 215:15 **bit** [3] - 7:7, 10:15, 54:16 bitch [2] - 33:3, 114:1 black [1] - 238:18 blame [1] - 86:8 blaming [3] - 55:18, 56:13, 85.17 blank [1] - 104:13 blatant [1] - 246:17 blocked [1] - 116:13 blocking [1] - 116:11 blowing [4] - 25:17, 25:19, 25:23, 26:3 Boards [1] - 235:16 **boil** [1] - 76:2 [1] - 3:15 bolster [9] - 235:5, 238:3, 238:23, 246:5, 246:17, 249:3, 249:14, 249:15, 251:10 **bolstering** [1] - 249:7 book [3] - 14:24, 20:11, 214:14 **bottom** [15] - 19:15, 47:9, 47:13, 51:18, 57:21, 62:6, 62:24, 85:21, 156:16, 165:7, 172:15, 172:18, 173:13, 178:4, 184:12 bought [1] - 57:7 Boulevard [1] - 3:10 bounced [1] - 238:8 box [4] - 28:8, 28:11, 28:12, 179:13 boyfriend [2] - 113:10, 113:11 [2] - 189:2, 189:11

break [31] - 24:23, 69:10,

69:23, 70:12, 76:12, 76:17,

77:2, 93:17, 95:15, 99:16,

190:5, 199:11, 199:15, 199:17, 223:21, 223:22, 226:7, 226:11, 226:17, 226:18, 227:13, 240:22 breakdown [1] - 76:6 breaking [8] - 25:1, 61:19, 68:15, 199:22, 200:24, 226:10, 228:7, 240:24 breaks [1] - 241:9 breakup [5] - 61:22, 81:25, 93:6, 101:2, 229:25 Brew [2] - 163:5, 163:11 Brews [1] - 122:23 brief [4] - 11:23, 163:17, 191:5, 202:18 briefing [1] - 151:14 briefings [3] - 65:2, 150:12, 150:14 $\textbf{briefly}\ [4]\ \textbf{-}\ 63{:}13,\ 70{:}21,$ 187:25, 197:19 **bring** [10] - 159:15, 170:3, 180:3, 188:11, 188:14, 237:24, 238:14, 243:8, 245:21, 246:14 bringing [4] - 218:2, 237:6, 237:21, 238:2 brochure [1] - 246:22 broke [18] - 61:13, 61:21, 62:13, 63:8, 66:12, 66:17, 103:24. 104:25. 125:23. 127:4. 134:23. 135:15. 136:21, 138:2, 166:5, 227:25, 229:22, 229:24 broken [8] - 82:4, 97:15, 98:15, 107:13, 135:11, 223:6, 223:21, 224:8 broom [1] - 164:23 brother [2] - 39:22, 39:24 brought [4] - 57:10, 187:11, 216:20, 237:11 bruising [1] - 200:2 building [4] - 73:21, 73:24, 74:5, 117:4 **Building** [1] - 191:9 built [1] - 239:5 bulk [2] - 141:20, 141:23 Bureau [16] - 84:9, 84:16, 85:1, 85:7, 85:13, 85:18, 86:9, 113:12, 129:20, 132:13, 132:15, 133:16, 203:4, 203:8, 213:11, 218:23 business [6] - 52:12, 52:15, 73:7, 133:21, 133:22, 232:12 BY [106] - 3:4, 3:10, 9:22, 10:2, 13:16, 15:11, 15:24,

116:18, 117:1, 134:24,

137:1, 164:9, 166:5, 166:7,

21:6, 22:14, 23:5, 27:23, 29:10, 29:23, 30:7, 30:13, 31:21, 32:13, 33:6, 33:18, 34:2, 35:17, 36:23, 38:12, 40:12, 40:20, 44:5, 45:8, 49:7, 49:17, 53:20, 55:2, 55:16, 56:14, 63:17, 68:11, 71:18. 80:16. 81:1. 86:3. 87:8, 89:10, 89:22, 90:16, 94:1, 94:19, 96:4, 100:22, 102:2, 105:2, 106:10, 108:8, 112:6, 113:17, 114:22, 117:16, 119:9, 123:13, 124:14, 133:8, 134:7, 137:22, 140:15, 141:10, 146:12, 147:14, 148:10, 150:9, 151:9, 153:1, 153:13, 156:13, 158:1, 161:13, 163:18, 168:2, 168:18, 169:14, 170:23, 181:16, 182:24, 183:19, 184:9, 187:3, 188:2, 191:2, 191:22, 194:6, 197:22, 200:18, 202:16, 205:15, 205:22, 209:1, 211:12, 212:21, 213:24, 214:18, 215:6, 215:19, 222:12, 227:10, 229:16

C [1] - 198:2 **CALCRIM** [2] - 236:4, 248:23 calculator [1] - 138:21 calendar [1] - 13:13 California [9] - 1:17, 2:17, 3:6, 3:11, 6:1, 237:2, 237:4, 237:22, 253:4 calm [1] - 76:7 camera [1] - 112:13 cancer [1] - 183:17 [1] - 163:5 cannot [1] - 237:22 capable [4] - 7:17, 44:23, 44:24, 193:25 capacity [4] - 47:20, 202:22, 207:21, 207:24 car [22] - 29:22, 29:25, 41:22, 41:24, 47:17, 159:11, 159:12, 159:15, 160:11, 192:24, 194:15, 196:5, 196:9, 196:13, 197:2, 197:7, 197:9, 198:9, 198:10, 198:11, 198:12 care [5] - 24:9, 158:23, 175:13, 175:17, 231:6 cared [1] - 39:20 career [2] - 122:10, 195:11 **CAREN** [2] - 1:7, 2:7 Caren [62] - 5:20, 6:6, 11:9,

17:10, 17:20, 18:16, 19:6,

17:15, 18:12, 21:9, 22:16, 23:10, 24:7, 24:17, 24:22, 25:7, 25:16, 25:19, 26:9, 26:14, 27:24, 28:13, 28:15, 32:3, 32:15, 33:14, 34:3, 34:4, 38:13, 39:5, 39:10, 55:6, 60:14, 60:15, 61:17, 63:25, 68:12, 84:24, 88:18, 88:21, 103:15, 122:22, 122:24, 123:14, 125:22, 138:1, 149:17, 176:25, 177:3, 177:19, 178:8, 183:14, 187:20, 191:23, 196:4, 196:13, 197:24, 203:10, 214:3, 214:6, 216:7, 216:13, 220:18, 223:19, 224:7, 250:9 [1] - 38:4 cares [1] - 176:17 carried [1] - 197:7 case [42] - 6:6, 10:22, 49:11, 49:12, 49:13, 49:15, 50:18, 73:10, 144:24, 145:1, 146:23, 154:9, 155:17, 196:1, 198:17, 211:1, 212:10, 212:19, 217:8, 233:7, 233:20, 233:24, 234:3, 234:12, 234:15,

234:19, 238:6, 238:13, 239:5, 240:18, 241:16, 242:9, 243:4, 243:5, 245:23, 246:16, 248:18, 249:1, 249:12, 249:15, 249:19, 249:23 CASE [2] - 1:9, 2:9

cases [8] - 234:15, 236:2, 236:3, 236:12, 236:16, 240:5, 243:5, 243:7

casual [1] - 192:20 cat [1] - 183:6

catching [1] - 69:17 category [1] - 243:19

caught [1] - 77:5

caused [4] - 72:21, 93:17, 139:18. 140:23

[1] - 3:7 cell [5] - 33:13, 105:13, 107:4, 160:19, 195:19 center [1] - 224:3 Century [3] - 191:10, 202:23 ceremony [1] - 220:7 certain [11] - 73:14, 122:7, 146:6, 146:11, 169:25, 170:6, 170:19, 171:15, 236:18, 240:11, 244:12 certainly [7] - 49:16, 94:11, 147:4, 181:11, 208:24, 211:11, 218:3

CERTIFICATE [1] - 253:1 certify [2] - 253:4, 253:12 Chad [1] - 3:16 chain [1] - 130:13 chance [12] - 37:7, 51:19, 62:3, 62:8, 63:20, 80:17, 80:19, 81:2, 84:21, 94:21, 151:12, 205:18 change [7] - 25:12, 177:10, 199:18, 221:12, 221:16,

247:13, 248:15 changed [7] - 27:25, 33:19, 55:4, 177:8, 177:13, 177:14, 199:24

changing [1] - 25:4 character [15] - 196:18, 196:20, 198:14, 199:19, 199:20, 199:25, 200:3, 204:13, 212:13, 212:14, 216:21, 217:3, 217:21, 218:2. 218:7

characterization [1] - 59:25 characterize [1] - 204:9 characterized [1] - 233:13 charge [7] - 217:7, 217:25, 218:1, 236:22, 236:23, 243:8, 251:3

charges [1] - 219:6 Chatsworth [7] - 121:3, 121:8, 121:13, 122:20, 127:20, 138:11, 138:18

Check [1] - 179:15 check [1] - 190:11 **checked** [1] - 179:17 chick [1] - 123:1

Children's [1] - 161:18

[1] - 3:4 Christmas [15] - 93:7, 93:8, 93:10, 95:10, 96:10, 98:13, 99:6, 99:13, 101:2, 103:25, 104:2, 109:20, 110:16, 112:17, 127:4

circle [1] - 193:18 circumstances [4] - 29:6, 124:20, 199:24, 243:25 cited [1] - 241:22

CityWalk [13] - 12:24, 101:15, 102:4, 102:20, 103:17, 105:5, 108:22, 109:3, 112:19, 114:10, 115:11, 122:15, 126:4

Civil [13] - 49:19, 49:23, 50:8, 73:19, 73:21, 73:24, 74:5, 191:17, 191:20, 206:12, 213:11, 222:3, 237:21

CIVIL [2] - 1:1, 2:1 claim [6] - 95:19, 103:9, 159:9, 218:19, 220:18, 234:18

claimed [1] - 108:13 claiming [2] - 234:25, 248:18 claims [3] - 82:3, 216:22,

220:18 clarification [1] - 44:1

clarify [4] - 16:12, 31:7, 49:14. 53:4

Clarita [1] - 76:9 classes [1] - 40:25

classic [3] - 240:22, 251:6, 251:17

clear [4] - 14:9, 45:5, 80:10, 107:25

cleared [1] - 222:6 clearly [1] - 240:4

click [1] - 186:14

client [3] - 231:17, 231:24

Clinic [1] - 232:22

clinical [1] - 76:18 **clip** [4] - 51:15, 150:25,

156:6, 156:17 clique [3] - 216:23, 217:18, 222:2

cliques [1] - 217:6

clock [1] - 116:22

close [3] - 111:11, 232:12, 247:20

Cloud [1] - 61:10 **cluttering** [1] - 15:3 **co**[3] - 54:9, 54:10, 118:12 co-workers [3] - 54:9, 54:10,

118:12 code [1] - 7:15

135:12

Code [6] - 234:8, 241:20, 242:8, 242:17, 249:24, 251:9

cohabitate [1] - 108:1 cohabitated [2] - 80:23, 98:9 cohabitating [2] - 97:21,

108:6 cohabitation [1] - 108:4 cold [3] - 105:22, 135:8,

colleague [2] - 17:5, 17:6 colleagues [1] - 30:24

comfortable [2] - 72:2, 72:9 coming [8] - 50:8, 74:13,

95:14, 109:15, 136:15, 179:9, 189:22, 246:2

command [8] - 130:14, 206:7, 209:24, 210:2, 211:14, 211:18, 211:21, 213:14

Commander [3] - 203:13, 207:25, 221:2

commander [1] - 227:24 Commander's [1] - 219:22

comment [2] - 122:24, 188:19

Commerce [1] - 3:6 **COMMISSION** [2] - 1:1, 2:1 committed [2] - 60:16, 211:25

common [5] - 48:4, 64:14, 65:4, 244:23, 250:5 commotion [2] - 93:18, 100:8

communicate [1] - 31:8 communicated [2] - 75:24,

communicating [2] - 33:16, 57:19

communication [12] - 20:5, 66:24, 68:2, 74:25, 76:13, 77:8, 93:16, 94:4, 145:23, 178:7, 207:1, 207:4

communications [2] - 50:12, 178:14

compared [2] - 159:1, 175:20

competent [2] - 204:12 complain [2] - 25:17, 25:19 complained [2] - 26:1, 26:5 complaining [1] - 82:2 complaint [7] - 77:5, 118:16, 135:15, 137:2, 137:12, 206:11, 214:3 complaints [3] - 211:14,

211:17, 211:20 complete [5] - 41:16, 52:1,

149:10, 149:12, 234:13 completed [1] - 83:22

completely [5] - 18:19, 20:12, 20:19, 93:16, 249:9

complicated [1] - 132:5 computer [3] - 161:3, 194:7, 253.8

computer-aided [1] - 253:8 concentrated [1] - 172:1 concern [8] - 32:12, 219:4, 220:8. 220:15. 221:25.

222:7, 223:11, 227:12 concerned [10] - 32:6, 77:1,

77:3, 209:2, 219:14, 219:23, 223:14, 230:1, 235:3, 241:8

concerning [1] - 208:11 concluded [4] - 99:5, 103:1, 103:16, 123:18

concludes [1] - 189:21 conclusion [6] - 27:19, 30:10, 81:23, 162:9,

169:22, 169:24 conduct [5] - 120:13, 210:15,

245:9, 250:9 confide [1] - 17:14 confirm [1] - 166:9

confirmed [2] - 55:22, 59:3

conflate [1] - 237:20 conflict [2] - 201:10, 229:1

confronted [2] - 27:4, 177:19

confused [1] - 240:6 consent [1] - 153:25 consider [5] - 12:8, 181:6, 200:10, 200:20, 200:24 considered [6] - 195:21, 203:24, 206:15, 210:15, 224:23, 239:24 consist [1] - 210:20 **consisted** [1] - 107:9 consistent [2] - 184:23, 241.17 consists [1] - 94:14 constitutes [1] - 240:19 contact [34] - 14:9, 31:17, 31:22. 34:6. 38:25. 42:7. 44:13, 78:7, 78:11, 79:6, 88:5, 99:4, 99:15, 101:13, 115:20, 121:16, 127:8, 128:16, 129:11, 130:8, 131:5, 134:13, 135:10, 144:22, 151:20, 164:5, 173:8, 195:18, 206:4, 214:2, 223:14, 226:5, 231:16, 231:17 contacted [25] - 49:13, 49:18, 49:24, 74:7, 78:12, 78:14, 78:15, 78:19, 78:20, 82:4, 82:9, 83:15, 98:22, 99:2, 100:9, 116:5, 119:3, 132:6, 132:17, 132:23, 133:14, 151:22, 193:23, 209:9, 213:16 contacting [8] - 43:6, 45:21, 49:9, 75:10, 99:24, 110:9, 119:17, 209:9 contain [1] - 224:21 content [5] - 77:20, 207:16, 209:5, 209:10, 212:22 contention [1] - 234:18 contents [1] - 205:19 context [9] - 19:14, 170:12, 184:17, 208:15, 208:18, 217:15, 228:5, 229:7, 236:4 Continental [1] - 3:10 continuation [1] - 85:4 continue [5] - 72:5, 93:12, 108:18, 168:8, 169:19 continued [3] - 111:3, 168:24, 227:22 **continuity** [1] - 180:18 contradict [1] - 92:7 contradicting [1] - 92:9 control [4] - 187:1, 187:4, 240:15, 240:24 conversation [73] - 29:7, 29:8, 31:10, 31:15, 32:25, 52:20, 75:5, 75:11, 76:14, 81:18, 82:11, 90:10, 90:18, 90:22, 91:3, 91:16, 91:19, 92:8, 92:13, 92:22, 93:19, 102:15, 105:7, 107:9,

108:16, 109:12, 110:4, 111:1, 111:2, 111:9, 112:9, 119:10, 120:22, 125:4, 125:25, 130:18, 132:4, 136:11, 136:20, 139:9, 139:20, 140:8, 149:18, 153:17, 153:18, 153:25, 154:7. 154:23. 155:2. 155:19, 157:15, 162:14, 162:24, 163:2, 176:8, 184:18, 184:22, 199:1, 199:3, 207:10, 207:16, 208:13, 209:5, 209:11, 209:12, 227:4, 227:7, 227:8, 227:12, 228:2, 228:10, 228:22, 229:4 conversations [13] - 93:2, 103:23, 104:1, 104:4, 104:5, 104:11, 112:17, 174:8, 184:24, 185:18, 229:8, 229:10, 229:15 **convey** [1] - 140:6 conveyed [2] - 77:14, 208:9 **conveying** [1] - 139:17 **cooperating** [1] - 246:15 **cooperation** [1] - 231:4 copies [6] - 15:1, 36:17, 59:12, 60:21, 180:8, 181:7 **COPS** [2] - 191:13, 191:14 **copy** [7] - 7:11, 11:2, 14:20, 69:19, 215:10, 215:15, 215:17 **cordial** [2] - 67:16, 67:25 corner [4] - 142:20, 143:20, 165:7, 172:15 correct [132] - 6:22, 7:13, 9:7, 9:18, 9:19, 10:4, 10:5, 12:11, 13:5, 15:18, 16:7, 16:8, 17:3, 17:8, 17:9, 21:2, 21:5, 23:14, 24:12, 24:14, 24:16, 26:12, 26:13, 36:12, 39:25, 42:1, 47:2, 47:3, 47:13, 47:17, 47:21, 47:22. 49:10. 53:14. 53:18. 53:24. 54:19. 55:24. 57:8. 57:13, 57:14, 57:16, 57:17, 59:1, 59:10, 60:21, 64:18, 65:16, 65:20, 72:1, 76:16, 76:23, 78:3, 79:5, 80:4, 81:17, 83:22, 86:12, 86:13, 96:11, 96:24, 97:20, 98:13, 98:17, 98:20, 98:21, 99:23, 101:3, 101:4, 101:7, 106:9, 107:11, 107:19, 109:10, 109:21, 109:22, 110:5, 118:3, 119:21, 120:24, 121:19, 125:14, 126:24, 129:2, 131:2, 132:7, 136:5, 138:5, 138:18, 138:19,

141:18, 142:17, 143:11, 144:3, 144:6, 144:19, 147:12, 147:19, 147:20, 150:17, 153:12, 154:3, 159:6, 161:22, 164:17, 171:12, 173:10, 173:11, 173:20, 175:4, 175:7, 175:8. 176:9. 176:13. 176:15, 193:22, 198:15, 204:4, 206:14, 207:23, 209:20, 209:25, 213:6, 213:12, 215:8, 216:8, 224:18, 227:14, 232:25 Correctional [1] - 203:1 correctly [1] - 34:13 correspondence [7] -205:24, 206:2, 206:3, 206:25, 207:13, 207:15, 208:4 Correspondence [1] - 5:20 correspondences [1] -184:25 corroborative [1] - 249:18 couched [1] - 243:20 counsel [3] - 172:23, 175:16, 179:24 Counsel [18] - 14:22, 63:19, 149:11, 157:19, 171:5, 172:10, 178:5, 181:17, 182:6, 185:2, 214:12, 217:24, 231:20, 232:3, 232:9, 239:9, 243:11, 250:21 Counsel's [1] - 189:25 count [2] - 37:5, 204:16 counter [1] - 131:17 **counter-report** [1] - 131:17 counterintuitive [2] - 234:5, 240.6 County [3] - 10:9, 82:14, 102:4 COUNTY [3] - 1:2, 2:2, 3:4 couple [6] - 50:22, 135:10, 147:18, 163:15, 177:18, 195:3 course [14] - 40:15, 90:7, 91:5, 91:8, 91:21, 91:24, 92:1, 92:12, 185:20, 204:17, 206:19, 208:12, 226:5, 238:1 courses [1] - 40:21 Court [4] - 138:11, 138:17, 141:17, 161:18 court [29] - 7:18, 9:13, 10:12, 27:8, 56:9, 56:11, 65:1, 124:5, 125:16, 126:7,

202:8, 232:10, 238:8, 245:19, 246:14, 248:10, 248:20 courtesy [1] - 181:12 Courthouse [7] - 121:3, 121:8, 121:13, 122:20, 127:20, 127:22, 127:24 courthouse [2] - 123:5, 139.4 courts [1] - 247:22 cousin [19] - 88:11, 88:19, 88:22, 89:2, 89:13, 90:18, 90:22, 91:3, 91:7, 91:8, 91:19, 92:4, 92:13, 92:14, 185:4, 186:12, 186:13, 186:20, 186:23 cousins [1] - 88:14 covered [2] - 45:4, 45:7 coveted [1] - 84:12 CP [1] - 82:2 credibility [13] - 234:4, 235:3, 235:5, 238:3, 238:23, 238:24, 239:6, 246:5, 246:18, 247:4, 249:4, 249:7, 251:10 credible [6] - 235:6, 238:25, 239:3, 239:4, 239:7, 249:17 crimes [1] - 122:7 Criminal [3] - 132:13, 133:15, 203:4 criminal [28] - 7:18, 236:2, 236:12. 236:15. 236:20. 236:22, 236:23, 236:24, 237:3, 237:9, 237:18, 238:8, 238:12, 239:14, 239:20, 242:3, 242:18, 243:4, 243:5, 243:6, 243:9, 243:21, 245:17, 247:22, 248:10, 250:25, 251:3, 251:14 Criminals [1] - 132:14 criteria [3] - 203:19, 243:4, 244:4 critical [2] - 234:4, 235:12 cross [26] - 6:11, 6:12, 17:17, 33:22, 40:11, 44:1, 70:15, 70:19, 71:2, 71:14, 117:13, 164:16, 171:9, 172:9, 174:9, 176:5, 178:5, 178:11, 181:17, 182:6, 184:16, 185:2, 187:10, 197:18, 213:20, 232:4 CROSS [6] - 4:3, 4:9, 34:1, 71:17, 197:21, 213:23 cross-exam [4] - 33:22, 44:1, 197:18, 213:20 cross-examination [17] -6:11, 6:12, 40:11, 70:19, 71:14, 171:9, 172:9, 174:9,

139:15, 139:16, 141:17,

127:16, 129:23, 130:10,

138:4, 138:22, 139:17,

140:7, 140:16, 147:6,

147:7, 180:11, 190:20,

176:5, 178:5, 178:11, 181:17, 182:6, 184:16, 185:2, 187:10, 232:4 CROSS-EXAMINATION [4] -34:1, 71:17, 197:21, 213:23 **CST** [4] - 129:21, 129:22, 130:15, 132:21 **cumulative** [1] - 247:8 **curiosity** [1] - 26:19 current [3] - 10:8, 71:21, 129:18 cuss [1] - 155:18 cussing [3] - 145:18, 155:15, 156:10 custody [4] - 11:14, 11:18, 30:22, 202:21 cut [1] - 93:16 cycle [3] - 240:22, 240:25, 247:9

D

daily [6] - 14:3, 14:7, 14:10, 14:18, 15:8, 15:12 Danowitz [16] - 143:8, 143:11, 143:15, 145:5, 148:20, 152:3, 152:13, 155:9, 156:23, 158:11, 173:10, 173:15, 173:19, 175:3, 175:17, 188:8 date [46] - 13:12, 13:14, 13:22, 16:3, 59:8, 63:22, 72:11, 72:19, 81:22, 83:15, 94:23, 94:25, 99:17, 103:7, 112:20, 115:20, 121:12, 122:23, 124:18, 126:3, 126:24, 127:21, 129:24, 131:6, 131:22, 131:25, 136:6, 136:12, 136:17, 136:19, 136:21, 136:22, 137:6, 138:3, 138:9, 138:13, 143:11, 166:18, 191:5, 191:7, 202:17, 209:10, 216:12, 226:15, 226:16, 229:4 dated [1] - 229:24 dates [18] - 15:4, 15:8, 65:14, 97:12, 136:16, 136:18, 137:23, 138:8, 138:20, 140:23, 165:1, 166:15, 166:20, 167:1, 167:11, 167:12, 175:25 dating [26] - 31:4, 31:10, 32:1, 32:3, 60:3, 60:16, 61:14, 61:17, 61:21, 61:22, 62:13, 63:8, 79:20, 79:21, 87:10, 97:22, 99:9, 107:20, 110:18, 110:19, 110:22, 144:9, 176:24, 177:3, 185:20, 229:19

dating/cohabitating [5] -80:22, 97:19, 97:23, 107:17, 107:22 days [5] - 15:3, 72:13, 119:13, 127:3, 151:16 deadline [1] - 85:6 deal [3] - 7:4, 7:24, 8:6 dealing [6] - 95:14, 149:1, 234:18, 235:13, 243:7, 243:25 December [46] - 15:9, 15:21, 17:12, 17:13, 29:12, 65:15, 81:21, 82:8, 82:10, 82:13, 87:1, 88:1, 88:10, 93:6, 94:5, 94:24, 95:1, 96:19, 96:24, 97:5, 97:8, 97:20, 97:22, 98:13, 98:16, 99:13, 103:25, 107:13, 107:18, 107:23, 108:13, 109:20, 110:14, 110:16, 110:17, 127:1, 130:23, 134:14, 138:14, 138:25, 139:14, 166:6, 169:15, 202:20 decide [2] - 231:16, 232:1 decided [1] - 237:8 decides [1] - 247:23 decision [3] - 18:19, 249:25, 251:24 declaration [1] - 96:15 deem [1] - 218:4 defendant [6] - 236:16, 236:20, 237:12, 239:15, 248:17, 251:1 Defendant [1] - 220:9 **defending** [1] - 43:20 **Defense** [1] - 180:19 defense [8] - 36:6, 190:1, 236:11, 237:11, 237:15, 243:7, 243:8, 248:23 definitely [1] - 135:6 definitive [1] - 112:5 delayed [1] - 6:20 deleted [1] - 141:23 **Democratic** [1] - 217:2 demonstrated [3] - 22:1, 22:2, 240:13 denying [1] - 35:24 Department [77] - 3:3, 6:21, 8:21, 10:3, 10:10, 15:6, 40:2, 49:19, 64:12, 70:25, 71:8, 71:25, 72:21, 74:8, 75:19, 78:7, 84:2, 86:24, 102:5, 120:18, 129:12, 131:12, 131:20, 132:7, 133:14, 133:18, 134:17, 137:3, 137:12, 142:5, 142:10, 142:25, 143:3,

145:25, 146:15, 147:17,

147:21, 150:11, 151:17,

154:13, 154:22, 155:10,

157:9, 158:4, 159:8, 174:10, 174:15, 175:1, 175:9, 176:8, 176:21, 181:19, 181:23, 182:4, 183:16, 189:8, 195:8, 198:25, 201:1, 202:18, 203:20, 204:11, 204:15, 206:16. 207:18. 209:7. 210:16, 216:23, 217:4, 218:15, 218:20, 219:21, 220:14, 223:9, 235:7, 246:20, 247:3 **DEPARTMENT** [3] - 1:10, 2:10, 3:4 department [3] - 78:11, 135:3, 143:24 **Department's** [21] - 9:17, 19:13, 51:11, 51:13, 56:22, 57:22, 61:25, 156:11, 172:9, 178:2, 180:3, 180:7, 180:11, 180:15, 180:22, 215:11, 215:13, 216:24, 224:2, 239:5, 249:15 **DEPARTMENT'S** [2] - 4:3, department's [1] - 150:7 Departmental [2] - 191:6, 218:10 Departments [1] - 173:22 depicted [1] - 95:3 depth [1] - 199:1 deputies [5] - 195:10, 204:3, 217:18, 221:4, 235:17 deputy [61] - 10:9, 12:21, 13:17, 14:3, 14:7, 14:8, 14:10, 14:18, 15:8, 15:12, 27:2, 28:18, 32:21, 34:14, 34:19, 39:2, 40:4, 40:22, 41:4, 42:16, 46:6, 64:6, 64:7, 65:6, 70:6, 82:14, 84:10, 112:24, 113:1, 113:3, 113:5, 113:7, 113:8, 121:20, 122:4, 122:14, 128:20, 150:17, 194:1, 194:10, 195:9, 195:15, 195:21, 196:14, 196:21, 197:2, 197:6, 197:9, 197:12, 197:14, 197:23, 203:14, 206:11, 208:4, 210:13, 210:14, 214:7, 217:6, 230:18, 235:7, 240:8 **DEPUTY** [2] - 1:10, 2:10 Deputy [319] - 6:8, 7:4, 9:25, 11:9, 13:19, 14:17, 16:18, 16:24, 22:15, 23:7, 24:5, 25:9, 26:23, 28:15, 28:17, 29:22, 30:5, 31:11, 31:12, 31:14, 34:7, 35:1, 37:3,

38:25, 39:14, 39:18, 39:24, 42:8, 42:15, 43:3, 43:7, 43:11, 43:19, 44:6, 44:9, 44:13, 44:25, 45:9, 45:19, 46:2, 46:18, 47:4, 47:19, 48:8, 48:18, 49:9, 51:5, 51:24, 53:2, 54:13, 54:21, 54:22, 55:7, 55:9, 55:10. 55:17, 55:18, 55:24, 56:3, 56:18, 56:24, 57:4, 57:12, 57:18, 59:7, 59:8, 59:20, 59:22, 59:24, 60:3, 61:12, 61:17, 63:7, 63:18, 65:15, 65:18, 66:8, 66:9, 66:12, 67:10, 67:12, 68:2, 68:24, 69:7, 69:11, 69:24, 70:14, 71:4, 74:20, 75:6, 75:7, 77:9, 77:12, 77:13, 78:4, 79:20, 81:21, 82:3, 82:11, 82:21, 82:22, 83:4, 83:10, 85:12, 85:17, 86:8, 86:22, 87:2, 87:13, 87:16, 87:19, 87:25, 89:4, 89:11, 90:1, 90:17, 90:24, 91:6, 92:3, 92:18, 93:2, 93:5, 93:11, 94:4, 95:10, 95:14, 96:14, 96:16, 96:19, 97:5, 97:15, 99:5, 99:9, 99:25, 101:9, 102:12, 103:20, 103:24, 105:3, 106:18, 107:1, 107:8, 108:10, 108:15, 109:2, 109:4, 109:10, 109:15, 110:1, 110:6, 110:14, 111:11, 112:8, 112:18, 113:18, 113:22, 114:4, 114:7, 115:20, 115:25, 116:4, 116:5, 116:11, 117:25, 118:15, 118:16, 118:18, 118:21, 119:3, 119:11, 119:16, 119:19, 120:7, 120:10, 120:21, 121:12, 121:16, 122:12, 123:14, 123:17, 123:20, 124:15, 125:5, 125:9, 125:17, 125:25, 126:3, 126:8, 127:8, 128:21, 129:1, 129:5, 130:25, 134:13, 139:19, 139:23, 140:7, 140:17, 140:24, 141:13, 142:1, 142:6, 142:8, 142:10, 142:12, 142:16, 143:16, 143:21, 143:24, 144:9, 144:17, 144:22, 144:23, 145:24, 146:23, 147:24, 150:11, 150:14, 153:17, 153:25, 154:7, 154:25, 155:17, 157:3, 157:16, 159:10, 159:14, 160:5, 160:18, 161:15, 161:19, 162:1, 162:8, 162:10,

37:19, 38:3, 38:18, 38:22,

162:16, 163:1, 163:10, 163:21, 189:2, 189:11, 189:24, 190:6, 191:3, 191:9, 191:23, 191:25, 192:2, 192:10, 192:13, 192:16, 194:21, 195:9, 196:19, 197:11, 197:25, 199:11. 200:1. 200:9. 200:20, 200:23, 201:3, 201:13, 201:17, 203:10, 203:12, 203:16, 204:5, 204:9, 204:14, 204:19, 204:22, 205:1, 205:25, 206:2, 206:6, 207:1, 207:9, 207:18, 208:9, 209:3, 209:14, 209:17, 209:21, 209:24, 210:1, 210:5, 210:8, 210:10, 210:23, 211:2, 211:3, 211:25, 212:10, 212:11, 212:13, 212:24, 213:4, 213:7, 213:13, 213:16, 217:16, 218:13, 219:19, 221:12, 228:17, 228:23, 229:4, 230:1, 230:3, 233:23, 245:11 derogatory [3] - 99:21, 139:6, 156:25 describe [4] - 104:1, 104:3, 115:1, 196:19 described [2] - 166:2, 184:6 describes [1] - 232:18 describing [1] - 227:8 deserve [1] - 27:2 detail [4] - 106:6, 148:21, 148:25, 153:4 detailed [1] - 173:8 Detective [17] - 143:7, 143:8, 143:10, 143:15, 145:5, 152:3, 155:9, 156:23, 158:7, 158:11, 173:10, 173:15, 173:19, 175:3, 175:17, 188:24, 189:8 detective [1] - 152:8 detectives [10] - 143:6, 145:8, 145:25, 148:20, 150:10, 152:2, 158:16, 158:20, 173:6, 174:7 Detectives [2] - 151:20, 188:7 determination [2] - 241:18, 248:21 determine [4] - 230:7, 235:22, 244:20, 245:5 **determined** [1] - 230:6 develop [1] - 12:10 developed [2] - 13:22, 219:7 [6] - 4:5, 8:15, 8:16, 9:3, 74:16, 76:15 [2] - 8:20, 9:3

difference [1] - 180:21 different [5] - 95:16, 170:21, 226:15, 233:18, 246:21 digest [1] - 231:25 digital [1] - 194:7 digitally [1] - 173:19 dinner [5] - 25:9, 25:11, 60:2, 60:5, 179:4 direct [6] - 70:15, 70:20, 74:25, 167:23, 200:5, 216:10 **DIRECT** [5] - 4:3, 4:9, 9:21, 191:1. 202:15 directed [4] - 51:4, 181:19, 207:13, 209:12 direction [1] - 253:9 disbelieve [1] - 212:24 disbelieving [1] - 213:1 discharge [1] - 234:12 **DISCHARGE** [2] - 1:6, 2:6 discharged [2] - 198:25, 235:17 disclose [1] - 68:1 discuss [2] - 65:2, 207:12 discussed [2] - 65:3, 73:8 discussion [4] - 77:8, 139:24, 152:18, 206:5 discussions [2] - 87:2, 88:18 disfunction [1] - 245:11 dismiss [3] - 128:3, 128:9, 128:11 dismissed [1] - 128:12 dismissing [1] - 128:17 disparity [1] - 235:19 dispatch [2] - 206:10, 206:12 dispatched [5] - 38:21, 42:3, 42:19, 44:7, 193:19 disperse [1] - 206:22 disputes [1] - 229:1 disrespect [4] - 196:24, 200:6, 200:10, 200:21 disrespectful [1] - 200:25 distance [1] - 17:7 distraught [1] - 206:20 **District** [6] - 121:2, 168:13, 236:13, 237:8, 247:2, 251:7 disturbing [1] - 207:20 doctor [1] - 243:17 document [30] - 11:1, 14:7, 79:24, 80:9, 80:10, 80:18, 81:2, 81:7, 81:11, 81:13, 81:14, 81:17, 105:19, 107:21, 107:22, 114:23, 115:10, 128:5, 138:4, 138:10, 140:3, 205:18,

205:23, 208:11, 209:4,

212:24, 213:2, 215:21,

documented [1] - 225:15

215:25, 216:9

231:5, 249:23 domestic [47] - 167:6, 167:9, 167:19, 168:5, 168:11, 168:15, 198:22, 199:9, 211:3, 211:25, 233:2, 233:7, 233:14, 233:18, 235:1, 235:13, 235:17, 236:4, 237:10, 237:13, 239:2, 239:14, 240:5, 240:9, 240:18, 240:19, 240:20, 240:23, 243:2, 243:9, 243:19, 244:13, 245:21, 246:9, 246:23, 247:7, 247:14, 247:19, 248:4, 248:16, 248:20, 249:10, 249:11, 249:19, 250:7, 250:11, 251:6 done [7] - 18:19, 158:5, 163:14, 174:24, 189:19, 212:17, 220:2 donut [3] - 28:8, 28:11, 28:12 door [18] - 96:7, 96:8, 96:23, 97:7, 98:16, 101:6, 126:25, 130:23, 135:19, 138:15, 158:14, 164:23, 168:7, 169:7, 169:17, 183:7 double [1] - 214:9 down [26] - 10:15, 12:22, 32:19, 76:2, 76:7, 86:15, 86:18, 106:15, 106:16, 135:8, 138:9, 138:13, 141:9, 141:12, 142:14, 142:17, 142:19, 142:20, 143:19, 148:2, 157:22, 157:23, 166:15, 212:13, 227:20, 246:13 draft [12] - 35:7, 35:14, 37:23, 37:25, 38:5, 38:14, 39:10, 46:23, 207:13, 207:14, 208:3, 209:3 drafted [5] - 35:18, 44:20, 79:24, 206:25, 229:7 drafting [1] - 44:18 drive [3] - 73:20, 73:23, 197:13 driver's [1] - 95:2 driving [4] - 46:19, 103:16, 105:9, 161:17 drove [1] - 73:22 drunk [1] - 114:1 dude [1] - 158:6 due [2] - 206:3, 210:24 duly [4] - 8:22, 71:9, 190:16, 202:3 duration [1] - 113:2 during [55] - 12:7, 19:9,

29:11, 41:19, 47:21, 48:8,

48:17, 57:19, 65:2, 73:8,

73:13, 73:16, 74:4, 76:7,

documents [4] - 15:4, 122:3,

83:13, 87:12, 87:25, 92:1, 93:2, 122:9, 136:15, 141:24, 143:14, 145:4, 145:13, 145:16, 146:13, 148:6, 152:18, 160:4, 162:13, 162:19, 162:24, 163:1, 163:7, 175:2, 175:14. 192:9. 193:15. 194:10, 198:8, 204:17, 206:19, 207:17, 208:12, 210:4, 210:7, 216:2, 216:10, 226:4, 229:7, 230:18, 230:22, 241:4 duties [7] - 34:19, 38:22, 41:9, 42:1, 122:3, 122:14, 150:16 duty [8] - 12:15, 115:21, 116:8, 116:9, 157:11, 196:5, 196:14, 214:23

Ε

e-mail [10] - 34:6, 34:11, 34:23, 35:6, 35:8, 37:15, 37:24, 43:2, 44:10, 46:23 E-mails [1] - 5:11 e-mails [6] - 34:18, 35:2, 35:22, 36:3, 37:20, 63:19 early [5] - 122:19, 193:8, 198:6, 214:7, 232:2 ears [1] - 123:3 East [1] - 191:15 Eastern [1] - 3:5 eating [1] - 33:2 Edelman [1] - 161:18 [2] - 43:4, 43:8 effect [5] - 79:16, 79:17, 118:12, 185:8, 239:12 **EFFECTIVE** [2] - 1:6, 2:6 effects [4] - 234:23, 239:11, 239:23, 241:24 effort [1] - 247:3 either [5] - 60:6, 146:5, 179:23, 237:11, 250:19 **EI** [40] - 3:11, 74:7, 105:10, 120:18, 131:11, 131:14, 131:20, 132:7, 133:14, 133:18, 134:12, 134:17, 142:5, 142:7, 142:9, 142:21, 142:23, 142:25, 143:3, 145:25, 146:15, 147:17, 147:21, 150:11, 151:17, 151:20, 154:22, 156:19, 157:14, 158:20, 159:8, 166:19, 172:10, 172:16, 175:4, 176:21, 188:5, 188:7, 241:4, 247:2 elected [1] - 143:19 **elements** [1] - 235:20 elicit [1] - 27:16

emergency [2] - 122:1, 122:13 emotional [2] - 18:6, 239:12 employed [2] - 10:6, 82:14 employee [1] - 210:10 employment [2] - 71:22, 77:3 encompass [1] - 102:21 encompassed [2] - 110:1, 110.3 encountered [1] - 195:18 end [14] - 7:24, 13:6, 17:22, 19:25, 20:2, 20:5, 20:24, 21:8, 32:14, 33:7, 97:22, 136:25, 148:3 ended [33] - 13:23, 19:7, 19:10, 19:20, 19:24, 20:2, 20:7, 20:13, 20:16, 20:17, 20:19, 33:4, 33:17, 65:23, 75:24, 79:21, 81:20, 97:13, 97:19, 98:2, 98:12, 107:18, 107:20, 107:23, 108:14, 109:19, 109:24, 110:10, 110:14, 110:17, 111:1, 111:2, 238:17 ending [5] - 2:18, 20:20, 23:8, 67:21, 67:23 enforcement [3] - 120:14, 235:14, 245:2 engaged [1] - 230:2 engineer [1] - 243:18 English [1] - 27:3 entail [1] - 204:3 enter [1] - 178:22 entire [2] - 44:18, 227:8 entries [3] - 62:1, 62:6, 151:13 entry [7] - 57:25, 62:24, 102:7, 106:15, 106:16, 106:24, 178:8 episode [2] - 95:13, 98:16 equality [1] - 118:16 Equality [1] - 78:21 escalate [1] - 240:16 escalated [1] - 240:16 **especially** [1] - 197:6 **ESQ**[1] - 3:10 essentially [3] - 170:5, 212:8, 232:18 establish [2] - 29:7, 70:24 established [1] - 40:7 estimate [4] - 11:15, 50:23, 185:7, 185:22 estimates [1] - 193:13 estimation [2] - 204:19, 221:22 evaluation [1] - 234:3 evening [4] - 108:23, 115:5, 134:9, 214:5 event [18] - 96:7, 96:8, 96:9,

96:22, 99:16, 101:6, 103:5,

118:23, 126:25, 131:18, 137:4, 138:15, 139:4, 139:7, 163:20, 204:25, 225:22, 237:7 events [11] - 98:19, 127:17, 131:1. 136:17. 139:14. 139:18, 145:23, 149:5, 159:6, 170:19, 171:7 eventually [2] - 178:17, 226:14 **everywhere** [1] - 123:3 Evidence [6] - 234:8, 241:20, 242:8, 242:17, 249:24, 251:9 evidence [21] - 99:6, 111:15, 146:2, 146:4, 217:16, 219:7, 220:1, 220:6, 220:12, 233:19, 234:25, 235:1, 236:18, 236:23, 238:14, 240:3, 241:2, 243:9, 248:11, 249:9, 249.18 **EVIDENCE** [2] - 5:3, 5:9 evidentiary [1] - 246:10 evidently [1] - 108:19 ex [2] - 207:6, 222:25 ex-girlfriend [2] - 207:6, 222:25 exact [6] - 37:11, 37:13, 77:11, 156:4, 165:1, 167:11 exactly [11] - 12:25, 14:8, 19:24, 33:3, 136:7, 136:22, 148:1, 235:11, 245:3, 251:4, 251:10 exam [4] - 33:22, 44:1, 197:18, 213:20 **EXAMINATION** [12] - 9:21, 34:1, 63:16, 68:10, 71:17, 168:1, 188:1, 191:1, 197:21, 200:17, 202:15, 213:23 **examination** [17] - 6:11, 6:12, 40:11, 70:19, 71:14, 171:9, 172:9, 174:9, 176:5, 178:5, 178:11, 181:17, 182:6, 184:16, 185:2, 187:10, 232:4 examined [10] - 8:23, 71:10, 190:17, 202:4, 232:23, 233:19, 244:9, 244:11, 249:8, 249:9 example [6] - 87:14, 219:25, 237:12, 238:13, 245:8, 249:1 except [3] - 217:4, 236:19,

250:25

exchanged [1] - 24:1

exclamation [1] - 166:13

excuse [2] - 69:11, 236:8

exercise [1] - 246:19 exerting [1] - 240:23 exhaust [1] - 21:15 exhibit [12] - 36:5, 36:9, 36:16, 36:24, 69:12, 150:5, 156:15, 157:21, 158:19, 173:7, 180:6, 205:5 Exhibit [73] - 19:13, 36:17, 36:19, 36:25, 42:14, 42:25, 51:11, 51:13, 56:22, 57:22, 61:25, 63:19, 80:3, 80:5, 84:20, 89:18, 89:19, 89:24, 92:7, 94:13, 94:14, 94:16, 94:24, 96:13, 97:2, 97:15, 99:6, 101:20, 101:22, 102:8, 106:5, 106:7, 106:14, 109:16, 111:13, 114:15, 114:17, 114:24, 150:7, 150:19, 151:7, 155:25, 156:11, 156:15, 157:21, 158:3, 158:19, 165:4, 165:16, 170:25, 172:9, 173:22, 178:2, 180:7, 180:11, 180:13, 180:15, 180:19, 180:22, 181:1, 181:2, 181:6, 184:11, 205:12, 205:17, 212:23, 215:13, 224:2, 224:17 exhibits [2] - 14:23, 14:25 **EXHIBITS** [2] - 5:3, 5:9 existence [2] - 217:8, 243:13 expect [1] - 197:11 **expectations** [2] - 240:11, 245:2 expected [3] - 66:23, 226:3, 227:1 **expecting** [1] - 164:3 experience [16] - 28:19, 34:14, 64:11, 122:2, 191:6, 198:14, 199:21, 203:21, 204:10, 209:23, 219:18, 219:22. 234:11. 244:23. 250:5. 251:8 experienced [1] - 204:3 **experiences** [1] - 211:24 **Expert** [1] - 239:22 expert [30] - 6:25, 7:4, 7:7, 7:25, 231:13, 231:22, 234:4, 234:10, 235:4, 236:14, 237:10, 239:1, 239:8, 241:14, 241:22, 242:8, 242:22, 242:25, 243:1, 243:3, 243:17, 244:2, 244:22, 244:23, 245:3, 245:13, 249:8, 250:4, 250:24 expert's [1] - 239:6 expertise [1] - 235:13 experts [1] - 243:16

explain [10] - 23:25, 26:17, 67:11, 145:22, 154:25, 170:10, 170:14, 234:5, 249:16, 250:17
explanations [1] - 244:15
express [2] - 68:16, 223:11
expressed [1] - 162:13
extensive [1] - 234:16
Extra [1] - 5:19
extra [9] - 159:15, 159:16, 160:7, 179:19, 179:24, 194:15, 196:9, 197:7, 197:9
extremely [1] - 28:17
eye [1] - 238:18
eyes [1] - 123:2

F

[1] - 190:22 face [8] - 114:1, 137:7, 144:17, 157:3, 157:16 face-to-face [3] - 144:17, 157:3, 157:16 Facebook [4] - 23:11, 23:12, 23:15, 23:24 Facility [1] - 203:2 facility [1] - 75:19 fact [22] - 26:25, 27:18, 29:17, 32:24, 35:24, 58:10, 65:3, 120:2, 168:11, 178:20, 181:22, 182:11, 195:16, 199:17, 218:14, 223:17, 224:7, 240:5, 240:19, 244:5, 244:24, 245:25 factors [3] - 123:12, 243:17, 249:1 facts [14] - 27:13, 27:16, 39:1, 44:14, 64:23, 170:2, 170:4, 210:21, 211:1, 212:9, 219:25, 228:21, 233:12, 241:18 factual [8] - 210:19, 219:12, 220:5, 237:17, 246:10, 246:18, 247:19, 248:21 fade [1] - 225:20 fair [5] - 46:25, 59:24, 92:25, 141:1, 244:19 [12] - 4:11, 159:14, 159:24, 160:1, 160:5, 189:24, 190:6, 190:21, 191:3, 197:23, 201:13, 201:17 1] - 190:14 **falling** [1] - 75:14 falling-out [1] - 75:14

false [7] - 58:18, 174:19,

211:21, 223:12

188:20, 189:4, 200:19,

familiar [4] - 46:4, 84:12, 189:14, 233:6 family [1] - 186:20 far [17] - 17:8, 36:1, 71:22, 77:15, 79:13, 86:22, 135:13, 136:18, 188:20, 196:13, 201:4, 211:2, 228:24, 231:22, 231:23, 240:12, 243:2 fast [1] - 10:13 Father's [2] - 157:1 fear [1] - 139:18 fearful [2] - 30:5, 30:8 February [4] - 13:3, 177:11, 191:7, 202:24 fell [2] - 238:17, 246:12 felt [12] - 28:24, 29:13, 58:10, 58:20, 68:16, 68:19, 68:23, 76:25, 153:22, 170:6, 178:16, 218:15 few [14] - 6:24, 51:18, 52:17, 80:20, 91:25, 119:13, 122:9, 141:23, 150:20, 185:10, 186:2, 186:3, 186:5, 223:4 Field [6] - 203:17, 203:20, 203:25, 204:2, 204:10, 213:5 field [9] - 46:6, 159:11, 193:2, 194:14, 196:21, 197:3, 201:4, 203:21, 206:23 fifteen [1] - 50:24 fifth [2] - 106:15, 106:16 fighting [1] - 237:14 figure [1] - 111:25 **file** [12] - 7:16, 77:6, 121:14, 122:20, 126:19, 126:21, 126:22, 132:3, 138:22, 155:20, 176:20, 241:16 filed [9] - 117:24, 121:1, 127:7, 127:19, 129:10, 130:22, 133:24, 218:23, 251:15 filing [5] - 85:6, 168:12, 180:11, 236:13, 237:9 fill [1] - 122:13 filled [5] - 126:7, 126:11, 128:5, 128:11, 146:15 **filling** [1] - 126:16 filmed [1] - 112:10 findings [1] - 238:24 **fine** [5] - 8:10, 15:5, 69:16, 151:15, 232:14 finish [6] - 9:11, 40:19, 104:23, 123:7, 169:11 finished [4] - 123:9, 164:16, 169:10. 181:8 First [1] - 42:24 first [39] - 8:22, 14:22, 49:13,

49:18, 58:1, 71:9, 72:23, 73:20, 74:7, 78:12, 79:14, 80:21, 83:16, 88:11, 94:25, 95:13, 102:7, 145:7, 152:6, 188:10, 188:17, 188:18, 190:16, 193:24, 196:12, 196:14, 196:16, 197:1, 199:7. 202:3. 202:7. 207:24, 214:12, 216:25, 218:13, 224:3, 236:1, 236:14, 243:10 first-hand [1] - 199:7 fit [2] - 248:16, 250:10 fits [1] - 249:10 five [6] - 62:6, 77:10, 94:20, 150:24, 151:13, 186:3 fix [1] - 158:13 flag [1] - 247:19 Flannel [4] - 236:11, 237:15, 243:7, 248:24 flip [1] - 232:11 Floor [1] - 3:10 focus [2] - 21:24, 43:21 follow [1] - 68:7 followed [12] - 93:16, 95:19, 96:1, 100:8, 103:9, 122:22, 125:13, 125:22, 130:24, 135:19, 138:1, 179:4 following [6] - 93:19, 103:6, 123:15, 137:6, 175:25, 183:8 follows [4] - 8:23, 71:10, 190:17. 202:4 **FOR** [2] - 5:3, 5:9 force [3] - 38:19, 39:11, 128:10 forceful [1] - 235:9 foregoing [2] - 253:5, 253:10 forget [1] - 28:19 form [3] - 83:22, 236:21, 251:2 Form [1] - 5:12 formal [1] - 50:4 formulate [1] - 251:11 formulating [1] - 251:13 forth [3] - 89:25, 134:14, 253:6 **forthcoming** [1] - 223:15 forward [3] - 6:16, 6:23, 128:6 forwarded [1] - 61:1 foul [1] - 155:23 foundation [20] - 17:17,

29:1, 29:15, 31:19, 168:11,

182:14, 183:12, 212:3,

238:22, 242:14, 242:16,

242:25, 244:8, 244:14,

244:20, 250:17, 251:13

foundational [1] - 29:3

218:25, 228:8, 238:9,

four [13] - 12:6, 29:11, 61:25, 77:10, 105:15, 108:11, 150:24, 151:4, 151:12, 202:21. 208:16 four-letter [1] - 208:16 fourth [1] - 106:16 frame [12] - 12:3, 12:22, 13:23, 32:4, 47:21, 48:8, 83:13, 94:8, 98:19, 104:24, 141:24, 141:25 freaking [2] - 183:6, 183:15 free [3] - 73:17, 117:3, 170:3 freeway [2] - 163:25, 233:9 frequently [1] - 145:13 fresh [2] - 19:11, 64:11 Friday [6] - 7:1, 8:3, 231:18, 232:7, 249:25, 251:21 friend [12] - 13:8, 43:17, 57:19, 58:6, 58:12, 58:14, 58:18, 66:23, 68:19, 143:25, 183:9, 184:3 friendly [6] - 12:10, 18:12, 64:3, 75:18, 99:14, 135:18 friends [45] - 11:19, 12:8, 15:17, 16:2, 16:6, 16:10, 16:18, 17:2, 17:12, 19:23, 22:15, 22:20, 23:9, 23:19, 23:21, 24:2, 24:13, 24:22, 28:16, 29:11, 30:23, 39:15, 40:7, 54:9, 58:22, 63:25, 65:14, 65:17, 65:23, 65:24, 66:6, 67:6, 67:19, 67:20, 84:24, 85:12, 99:14, 100:7, 135:18, 144:6, 175:11, 192:17, 192:18, 192:19, 192:20 friendship [14] - 12:10, 12:13, 13:6, 13:25, 16:24, 23:7, 24:4, 32:14, 65:24, 66:17, 67:3, 67:22, 67:24, 75:24 friendships [1] - 17:8 FROM [2] - 1:9, 2:9 front [9] - 10:24, 51:9, 106:14, 127:16, 137:7, 150:20, 178:17, 238:1, 251.18 FTO [2] - 203:17, 204:6 fuck [1] - 227:23 fucked [1] - 227:23 fucking [9] - 91:11, 92:19, 113:19, 113:22, 114:1, 144:24, 145:1, 208:17 full [2] - 7:21, 9:1 **function** [1] - 197:13 fundamental [1] - 238:6 **FURTHER** [1] - 68:10

G [9] - 232:16, 232:17, 232:21, 238:4, 246:4, 247:6, 250:6, 251:4, 251:11 game [1] - 183:6 gas [3] - 29:25, 30:6, 30:14 gather [1] - 206:21 general [4] - 23:16, 102:25, 227:16, 233:2 generalization [1] - 136:18 generally [2] - 169:11, 245:16 generate [1] - 42:4 generated [1] - 44:15 gent [1] - 152:4 gentleman [1] - 140:21 [1] - 82:23 [70] - 30:18, 30:20, 30:23, 30:25, 31:5, 31:8, 31:15, 31:16, 31:17, 31:22, 32:5, 32:16, 32:25, 33:2, 51:1, 51:6, 52:25, 53:1, 53:16, 53:21, 53:23, 53:25, 54:2, 54:6, 54:8, 54:11, 54:18, 54:24, 55:11, 55:19, 55:23, 56:15, 58:24, 59:3, 59:13, 59:16, 60:9, 60:20, 60:25, 74:14, 74:17, 74:19, 74:23, 75:1, 75:2, 75:5, 75:8, 75:11, 75:12, 76:15, 77:13, 77:16, 120:2, 120:3, 121:5, 121:7, 122:22, 126:16, 142:7, 142:15, 143:20, 143:25, 144:6, 144:8, 144:19, 144:23, 176:24, 177:2 get-together [1] - 112:20 girlfriend [3] - 207:6, 222:25, 223:6 given [4] - 136:17, 161:9, 221:6, 228:21 glad [3] - 156:19, 175:3, 218:17 glanced [1] - 7:8 glass [11] - 96:6, 96:8, 96:23, 98:16, 101:5, 126:25, 130:23, 158:14, 168:7, 169:7, 169:17 glasses [1] - 183:21 **GOLDFEDER** [183] - 3:10, 6:14, 6:19, 6:23, 7:14, 8:10, 14:20, 14:23, 15:2, 17:16, 18:13, 18:25, 21:12, 22:25, 29:1, 29:15, 30:9, 31:18, 32:7, 33:10, 33:23, 34:2, 35:17, 36:5, 36:9,

36:14, 36:16, 36:23, 38:9,

38:12, 40:12, 40:20, 44:5,

45:8, 49:7, 49:16, 49:17, 53:5, 53:20, 55:2, 55:16, 56:14, 63:10, 68:5, 69:2, 69:11, 69:15, 69:21, 70:16, 71:15, 71:18, 80:2, 80:8, 80:14, 80:16, 81:1, 86:3, 87:8, 89:10, 89:17, 89:22, 90:16. 93:23. 94:1. 94:12. 94:19, 96:4, 100:12, 100:22, 101:20, 101:25, 102:2, 105:2, 105:20, 106:9, 106:10, 108:8, 112:6, 113:17, 114:15, 114:20, 114:22, 116:19, 116:23, 117:14, 117:16, 119:8, 119:9, 123:10, 123:13, 124:1, 124:14, 133:8, 134:7, 134:21, 136:1, 137:21, 137:22, 140:13, 140:15, 141:10, 146:12, 147:4, 147:12, 147:14, 148:8, 148:10, 150:3, 150:9, 151:7, 151:9, 153:1, 153:6, 153:12, 153:13, 156:1, 156:4, 156:13, 157:20, 157:25, 158:1, 161:13, 163:14, 163:18, 164:8, 164:17, 168:10, 169:8, 169:21, 180:2, 180:10, 180:16, 180:18, 181:11, 182:14, 183:11, 185:23, 187:25, 188:2, 189:17, 190:3, 190:25, 191:2, 191:22, 194:6, 197:16, 200:18, 201:11, 201:14, 201:20, 202:13, 202:16, 205:8, 205:14, 205:15, 205:22, 208:24, 209:1, 211:11, 211:12, 212:21, 213:19, 214:14, 214:24, 216:17, 216:25, 217:7, 218:6, 218:21, 228:8, 231:1, 231:11, 231:22, 231:25, 232:10, 236:1, 236:8, 236:10, 242:16, 242:24, 245:16, 250:21, 251:25 Goldfeder [14] - 7:13, 15:1, 116:17, 117:12, 137:20, 164:16, 180:25, 181:10, 187:24, 190:24, 202:12, 231:9, 231:16, 235:25 goodbye [1] - 208:16 grabbed [1] - 168:20 grace [1] - 157:13 [2] - 88:17, 88:19 granted [2] - 100:15, 124:6 grapevine [1] - 210:23

great [3] - 148:21, 149:1,

157:21

group [9] - 189:12, 217:17, 219:8, 219:9, 220:11, 220:12, 220:22 guess [9] - 81:25, 82:2, 89:17, 91:9, 135:16, 138:6, 198:7, 231:18, 251:20 guessing [3] - 11:17, 12:4, 88:15 guest [2] - 183:5, 188:4 guy [3] - 31:3, 135:4, 233:8 guys [3] - 11:18, 12:7, 12:24

Н

Hail [1] - 219:1 half [3] - 6:17, 66:4, 241:6 Halloween [2] - 32:18, 32:20 hand [12] - 8:18, 14:16, 14:18, 71:5, 85:11, 95:5, 128:6, 172:15, 179:14, 190:12, 199:7, 201:22 hand-wrote [1] - 179:14 handed [2] - 50:14, 236:6 handful [4] - 186:6, 186:7, 186:8, 186:15 handle [8] - 6:25, 41:25, 65:3, 164:23, 175:10, 201:8, 204:17, 211:14 handled [1] - 122:9 handles [1] - 14:8 handling [6] - 41:8, 156:19, 175:4, 192:24, 206:12, 218:18 handwriting [1] - 126:12 handy [1] - 138:21 hang [3] - 27:9, 192:20, 201:21 **happy** [2] - 15:1, 94:11 harassed [1] - 113:1 harassing [3] - 77:25, 79:17, 177:17 hard [5] - 7:11, 137:17, 221:5, 221:6, 221:20 harm's [1] - 197:12 hate [2] - 113:19, 113:25 hated [1] - 113:22 head [4] - 27:15, 65:14, 163:1, 234:7 hear [6] - 89:8, 160:23, 199:13, 235:24, 244:19, 245:5 heard [13] - 2:20, 56:12, 108:5, 189:10, 196:7, 196:12, 196:15, 196:16, 197:1, 210:22, 220:22, 221:1, 239:17 hearing [7] - 49:20, 127:21, 187:12, 210:20, 219:13, 231:18, 241:3

HEARING [300] - 1:3, 1:25,

2:3, 6:4, 6:10, 6:15, 7:6, 7:12, 7:19, 8:9, 8:12, 8:15, 8:17, 8:25, 9:5, 9:8, 9:16, 10:1, 13:10, 15:20, 15:23, 16:11, 16:16, 16:23, 17:2, 17:4, 17:6, 17:18, 18:14, 19:2, 20:10, 20:22, 20:25, 21:3. 21:14. 22:7. 22:13. 23:2, 27:6, 27:9, 29:2, 29:5, 29:18, 30:2, 30:11, 31:20, 32:8, 32:11, 33:11, 33:22, 35:10, 36:8, 36:11, 36:15, 36:21, 40:9, 43:18, 43:24, 45:4, 49:6, 49:14, 53:3, 53:6, 53:10, 53:15, 53:19, 55:13, 56:2, 56:9, 63:11, 63:14, 65:13, 65:17, 65:21, 66:5, 66:8, 66:11, 66:16, 66:21, 66:25, 67:3, 67:7, 67:11, 67:14, 67:18, 68:3, 68:6, 69:4, 69:6, 69:9, 69:17, 69:22, 70:1, 70:3, 70:6, 70:9, 70:11, 70:17, 70:22, 71:1, 71:12, 80:4, 80:12, 86:1, 87:5, 89:7, 89:21, 90:4, 90:12, 94:18, 95:23, 100:14, 100:19, 101:24, 104:7, 104:10, 104:13, 104:18, 104:22, 105:22, 105:24, 106:1, 106:5, 108:2, 111:16, 111:21, 111:24, 113:16, 114:19, 116:17, 116:21, 116:24, 117:8, 117:10, 117:15, 123:8, 124:3, 124:6, 124:9, 124:11, 133:3, 134:2, 134:6, 134:20, 134:22, 135:20, 135:23, 136:2, 136:9, 136:24, 137:19, 141:6, 146:3, 147:2, 147:5, 147:8, 149:13, 149:20, 149:23, 150:5, 150:8, 151:5, 151:8, 152:25, 153:8, 155:24, 156:2, 156:12, 157:18, 160:22, 161:1, 161:4, 161:7, 161:12, 163:16, 164:11, 164:14, 164:18, 165:3, 165:8, 165:11, 165:15, 165:18, 165:20, 166:1, 166:9, 166:17, 166:23, 167:4, 167:13, 167:21, 167:25, 168:14, 168:17, 169:9, 169:13, 169:23, 170:13, 179:12, 179:23, 180:9, 180:12, 180:23, 181:5, 181:9, 181:14, 182:16, 182:21, 183:13, 183:22, 183:25, 184:4, 184:8, 185:25, 186:5,

186:7, 186:17, 186:21, 186:25, 187:23, 189:18, 189:20, 190:1, 190:4, 190:9, 190:19, 190:23, 197:17, 200:14, 201:12, 201:16, 201:21, 202:6, 202:11, 205:7, 205:9, 205:20. 208:22. 211:8. 212:6, 213:20, 215:1, 215:5, 216:19, 217:9, 217:13, 217:20, 217:23, 219:4, 220:20, 220:25, 221:8, 221:11, 221:15, 221:21, 221:24, 222:11, 227:3, 227:6, 228:11, 228:15, 228:20, 228:25, 229:6, 229:12, 229:14, 230:25, 231:2, 231:9, 231:12, 231:15, 231:23, 232:2, 232:8, 232:15, 232:21, 233:1, 233:22, 234:14, 234:24, 235:24, 238:10, 239:18, 241:10, 241:13, 241:19, 242:1, 242:6, 242:19, 242:22, 243:22, 245:7, 249:6, 250:3, 250:13, 251:19, 251:23, 252:1, 253:1, 253:20 Hearing [23] - 2:20, 2:21, 8:22, 36:20, 71:9, 80:6, 89:20, 94:17, 101:23, 106:8, 114:18, 181:3, 190:16, 202:3, 205:13, 213:11, 215:14, 237:21, 237:25, 238:9, 246:10, 247:23, 253:3 Hearings [1] - 235:16 hearsay [11] - 17:16, 21:22, 21:23, 30:9, 31:18, 56:1, 56:4, 124:1, 183:11, 248:2 Hearsay [1] - 32:7 heated [1] - 162:20 heck [1] - 77:4 held [1] - 196:24 help [60] - 10:14, 13:18, 14:11, 28:20, 34:13, 34:18, 35:9, 35:21, 35:23, 35:24, 36:2, 37:14, 38:8, 43:13, 45:12, 45:14, 45:15, 45:22, 46:23, 48:5, 48:7, 48:16, 48:22, 64:8, 64:9, 64:12, 65:4, 79:23, 80:1, 87:16, 88:8, 95:8, 96:20, 100:2, 100:5, 100:17, 100:19, 101:14, 101:17, 114:12, 122:13, 134:10, 135:1, 135:5, 135:18, 136:25, 137:3, 153:23, 195:10, 201:8, 201:9, 206:21,

234:5, 241:14, 241:18, 242:9, 250:18 helped [8] - 35:5, 39:24, 40:1, 40:8, 88:4, 100:6, 109:13. 195:12 helpful [6] - 28:17, 58:14, 140:2, 233:5, 244:5, 245:4 helping [16] - 28:17, 34:10, 34:11, 34:15, 35:2, 35:3, 35:24, 45:24, 47:19, 58:22, 64:6, 66:2, 66:3, 155:20, 155:21 helpless [1] - 245:9 hereby [1] - 253:4 hereunto [1] - 253:14 herself [3] - 126:22, 201:7, 235:10 Hi [1] - 23:16 high [2] - 175:12, 196:25 highlighted [1] - 110:24 highly [1] - 83:24 Highway [1] - 233:10 himself [3] - 65:9, 195:14, 219:21 hire [3] - 191:5, 191:7, 202:17 hired [2] - 32:21, 202:20 history [2] - 227:8, 240:21 hold [1] - 173:23 holding [1] - 95:4 hole [1] - 224:3 Holloway [1] - 38:18 Holly [1] - 192:23 Hollywood [42] - 10:10, 10:19, 11:21, 11:25, 16:4, 16:14, 32:17, 34:17, 34:21, 34:24, 38:22, 39:2, 41:3, 41:9, 43:4, 43:15, 45:10, 46:1, 46:5, 46:20, 48:16, 60:9, 84:3, 87:20, 115:7, 122:15, 150:12, 159:10, 191:12, 191:16, 192:1, 192:4, 192:6, 192:10, 192:13, 193:7, 193:16, 194:2, 194:15, 194:22, 196:10, 196:21 home [20] - 76:7, 93:17, 95:20, 96:2, 100:8, 103:6, 103:9, 103:16, 105:3, 125:13, 125:22, 130:24, 135:19, 136:8, 136:15, 138:1, 139:8, 183:5, 224:8 homicide [1] - 237:15 Homicide [1] - 203:8 honest [3] - 210:10, 216:3, 218:8 honestly [4] - 97:11, 193:17, 198:5, 199:5 honeymoon [1] - 240:25

Honor [22] - 8:11, 33:23,

36:6, 68:5, 70:16, 71:15, 80:2, 117:14, 137:21, 156:5, 157:20, 163:14, 164:8, 164:17, 180:2, 190:25, 202:13, 205:8, 218:6, 236:1, 245:17, 251:25 hoping [1] - 18:23 hot [2] - 135:8, 135:12 hour [7] - 6:18, 70:13, 72:24, 73:8, 117:1, 146:13, 163:20 hours [10] - 50:22, 76:8, 102:20, 111:12, 115:14, 125:21, 137:25, 146:22, 147:18, 149:5 house [43] - 18:2, 18:6, 18:7, 18:9, 30:6, 30:15, 76:6, 76:11, 82:4, 95:15, 96:6, 97:16, 98:15, 99:16, 112:8, 123:21, 125:17, 125:23, 135:11, 136:6, 136:13, 136:21, 138:2, 139:13, 139:20, 139:24, 140:17, 140:22, 146:10, 146:24, 149:2, 149:5, 149:17, 157:4, 164:2, 164:6, 172:11, 176:1, 183:15, 183:18, 228:7 human [1] - 243:17 Humphrey [5] - 155:9, 156:23, 158:11, 188:8, 234:15 hundred [1] - 245:10 husband [1] - 248:19 hypothetical [1] - 233:16

ı

i.e [1] - 230:5

IA [2] - 148:6, 148:7 IAB [6] - 160:4, 166:19, 188:10, 230:18, 230:22, 241.4 ICIB [7] - 132:10, 132:17, 132:23, 133:7, 133:11, 134:16, 154:15 idea [11] - 13:11, 32:24, 39:17, 102:14, 108:20, 111:2, 136:3, 141:22, 162:17, 184:20, 222:4 **IDENTIFICATION** [2] - 5:3, 5:9 identification [10] - 36:20, 80:6, 89:20, 94:17, 101:23, 106:8, 114:18, 181:3, 205:13, 215:14 idiot [1] - 208:17 ignore [1] - 93:14 **immediately** [1] - 161:16

immunity [2] - 245:20, 247:25 impacts [1] - 217:3 imperfect [2] - 236:11, 243:8 impermissible [3] - 236:25, 238:4, 249:4 imply [1] - 112:3 important [4] - 170:1, 206:15, 206:21, 208:11 **Imposition** [1] - 218:11 **impression** [2] - 76:21, 86:14 improper [1] - 27:19 **improve** [1] - 221:22 **IN** [4] - 1:6, 2:6, 5:3, 5:9 in-depth [1] - 199:1 In-service [1] - 5:17 in-service [5] - 114:13, 115:2, 115:3, 115:7, 214:10 inaction [2] - 240:12, 250:19 inappropriate [6] - 64:5, 64:16, 118:7, 139:6, 168:13, 210:15 incessantly [1] - 26:6 incident [25] - 25:8, 28:7, 39:1, 42:18, 96:1, 97:7, 100:10, 100:11, 130:23, 160:14, 165:12, 166:2, 168:7, 168:20, 168:24, 169:5, 169:16, 178:21, 179:2, 179:5, 183:2, 199:6, 216:12, 230:16, 233:15 incidents [3] - 46:24, 159:6, 179:7 inclination [2] - 181:1, 244:17 include [4] - 172:24, 173:3, 178:13, 226:3 included [3] - 81:10, 173:15, 178:7 includes [1] - 42:3

including [1] - 239:11

incoming [4] - 107:12,

110:25, 111:19, 112:3

incomplete [7] - 148:13,

149:6, 149:8, 149:19,

incorporate [1] - 42:17

incredible [1] - 197:4

249:18

223:5, 241:4

increments [1] - 111:4

independent [2] - 223:2,

indicate [8] - 24:23, 48:2,

97:2, 126:6, 127:6, 143:15,

indicated [21] - 54:20, 55:4,

57:15, 58:2, 60:10, 60:18,

incorporated [1] - 140:20

152:22, 153:10, 172:25

income [1] - 247:12

142:15, 152:2, 157:7, 162:19 indicates [4] - 82:20, 96:16, 97:23. 102:9 individual [11] - 74:14, 130:13. 204:16. 207:19. 209:9, 219:3, 246:12, 246:21, 246:25, 248:3, 248:18 individuals [2] - 211:18, 211.21 indoctrination [1] - 122:3 inference [1] - 249:11 information [53] - 28:14, 28:22, 39:6, 44:10, 48:25, 54:16, 58:5, 68:1, 68:13, 68:22, 72:8, 75:8, 79:14, 79:25, 81:7, 81:10, 81:16, 82:6, 82:24, 83:14, 85:22, 86:15, 86:20, 97:24, 98:6, 98:11, 127:11, 130:5, 141:2, 141:12, 141:16, 144:12. 145:6. 172:24. 173:3. 173:16. 178:7. 179:7, 181:22, 182:1, 182:3, 184:5, 196:15, 206:21, 206:22, 207:25, 208:7, 208:8, 210:19, 212:3, 223:1, 223:15 informed [9] - 6:7, 74:23, 75:7, 78:16, 79:7, 123:21, 130:2, 144:18, 189:10 infuriated [1] - 161:22 Inglewood [2] - 127:22, 127:24 initial [4] - 143:5, 146:14, 147:23, 151:17 initiated [2] - 32:25, 230:12 initiating [1] - 230:2 injured [2] - 12:15, 13:21 insanely [2] - 66:16, 66:19 inside [4] - 225:9, 226:19, 226:22, 248:13 Instagram [3] - 31:3, 54:17, 54:18 instances [2] - 30:1, 30:15 instead [4] - 135:4, 143:19, 143:25, 144:6 instructions [3] - 186:22, 236:4, 248:23 integrity [2] - 204:20, 210:8 intended [1] - 240:2 intention [1] - 225:21 interact [2] - 197:24, 204:6 interacted [1] - 196:20

interacting [1] - 201:4

interaction [2] - 193:21,

61:3, 61:12, 72:24, 76:24,

92:3, 97:3, 106:11, 108:9,

108:23, 117:18, 125:20,

197:10 interactions [3] - 121:12, 201:3, 204:23 interest [1] - 241:7 interested [1] - 253:12 **interfering** [1] - 176:3 Internal [16] - 11:3, 50:7, 57:9, 115:24, 132:13, 132:14, 133:15, 159:5, 159:9, 159:18, 159:22, 195:25, 196:3, 196:17, 203:4, 213:11 internal [1] - 230:10 internally [1] - 37:1 internet [1] - 199:22 interpret [1] - 111:17 interpretation [1] - 111:25 interruption [4] - 55:1, 80:24, 106:4, 181:13 interview [36] - 11:3, 19:9, 50:4, 50:6, 57:2, 60:10, 115:23, 133:10, 143:14, 145:4, 145:14, 151:15, 152:19, 155:8, 158:10, 158:16, 158:19, 159:4, 159:18, 159:23, 160:4, 162:19, 162:21, 173:9, 173:18, 175:2, 175:14, 188:10, 188:13, 188:14, 215:11, 215:23, 216:2, 224:1, 230:19, 230:22 Interview [1] - 5:5 interviewed [15] - 10:21. 26:20, 52:4, 57:9, 58:2, 58:9, 145:24, 148:24, 195:25, 212:17, 213:10, 215:7, 233:23, 246:6, 246:24 interviews [3] - 142:24, 143:2, 147:16 intimate [5] - 234:22, 239:10, 239:22, 241:23, 250:12 intoxication [1] - 38:20 introduce [1] - 248:11 Investigation [2] - 132:14, 133:16 investigation [7] - 148:7, 211:17, 215:8, 218:18, 230:11, 230:19, 250:8 Investigations [1] - 203:4 investigative [1] - 212:2 invitation [2] - 141:12, 157:4 invite [8] - 103:20, 105:3, 105:11, 125:9, 139:20, 150:1, 163:10, 163:20 invited [17] - 60:5, 125:17, 139:12, 139:13, 139:23, 140:7, 140:16, 140:21,

144:17, 146:7, 146:23,

147:23, 148:7, 149:17,

150:1, 172:11, 182:17 inviting [2] - 135:1, 179:10 involve [1] - 206:25 involved [9] - 82:1, 93:3, 123:25, 157:9, 174:10, 195:13, 211:16, 217:5, 219:16 involving [2] - 172:2, 240:5 iota [1] - 217:3 IP [1] - 81:25 iPhone [2] - 160:21, 160:24 irrelevant [8] - 32:8, 32:11, 158:25. 175:20. 212:7. 217:1, 218:7, 246:23 **irrespective** [1] - 248:12 isolation [1] - 240:15 issue [9] - 7:20, 7:25, 69:1, 231:13, 236:3, 239:9, 242:7, 243:1, 249:7 issues [10] - 47:24, 204:17, 204:18, 210:5, 210:7, 210:24, 236:10, 236:11, 239:1, 248:24 itself [1] - 242:17

J

jacket [1] - 105:24 jails [1] - 202:21 **January** [47] - 15:9, 15:10, 87:3, 99:24, 100:3, 100:20, 100:25, 101:9, 102:3, 102:8, 103:10, 103:13, 103:17, 103:21, 105:4, 105:8, 106:11, 107:5, 108:22, 109:10, 109:15, 110:2, 110:6, 112:7, 112:23, 112:25, 113:19, 113:23, 123:19, 124:16, 125:13, 125:20, 126:9, 130:24, 135:21, 136:11, 137:4, 137:25, 139:1, 139:15, 163:19, 182:7, 183:2, 184:5, 202:22 jealous [4] - 66:17, 66:20, 68:25, 176:22 jealousy [1] - 69:1 Jennings [2] - 188:25, 189:8 job [19] - 39:25, 40:1, 41:25, 86:24, 113:4, 113:19, 113:22, 113:25, 137:18, 149:1, 150:16, 157:12, 157:13, 162:5, 174:11, 174:16, 208:17, 210:14, 218:22

[2] - 1:3, 2:3 [1] - 2:20 judge [2] - 127:16, 178:17 judicial [1] - 237:16 July [38] - 72:16, 72:25,

73:20, 92:2, 92:16, 108:10, 109:25, 117:17, 118:1, 118:2, 120:20, 121:1, 121:13, 122:21, 126:17, 127:7, 127:20, 129:11, 129:25, 131:23, 132:4, 133:24, 134:9, 134:23, 138:4. 138:18. 138:24. 143:12, 144:15, 145:7, 148:24, 151:16, 152:19, 158:8, 158:16, 160:16, 167:10, 172:17 juncture [5] - 78:7, 96:23, 118:14, 120:1, 120:12 June [49] - 83:16, 86:7, 92:16, 97:17, 98:23, 107:17, 114:9, 115:6, 115:25, 116:5, 116:12, 120:17, 120:21, 121:11, 124:18, 124:21, 125:18, 139:11, 139:19, 139:24, 140:17, 141:21, 144:13, 144:15, 144:18, 147:25, 157:1, 157:2, 157:15, 160:4, 161:23, 162:5, 162:12, 172:11, 173:9, 174:4, 177:20, 179:10, 182:18, 183:1, 184:6, 188:4, 204:25, 206:6, 216:6, 222:15, 222:19, 222:20, 222:22 jury [2] - 238:1, 251:18 justifiable [1] - 237:15 justify [1] - 104:5

K

2] - 2:21, 253:3 [2] - 1:24, 253:19 keep [4] - 10:15, 18:12, 157:12, 187:7 kept [2] - 17:7, 20:5 key [1] - 159:15 keyed [1] - 241:17 keys [15] - 159:12, 159:19, 159:25, 160:6, 160:7, 160:12, 194:16, 196:5, 196:9, 196:13, 197:2, 197:7, 197:10, 198:21, 199:6 kicked [1] - 114:1 kids [1] - 247:13 [2] - 163:5, 163:12

[2] - 163:5, 163:12 **kind** [29] - 10:13, 14:8, 21:20, 43:20, 50:16, 92:20, 109:1, 140:23, 170:2, 176:6, 176:19, 185:22, 195:4, 195:8, 195:9, 201:6, 207:25, 211:3, 219:23, 220:8, 221:8, 222:6, 227:16, 228:21, 229:2,

233:13, 235:9, 237:15, 247:23 king [6] - 41:22, 41:24, 192:23, 198:9, 198:10, 198:11 **knowing** [2] - 211:1, 212:9 knowledge [12] - 21:15, 21:25, 28:19, 48:11, 48:13, 81:5, 199:8, 203:21, 215:3, 219:13, 222:8, 249:14 knowledgeable [1] - 34:15 known [7] - 11:12, 74:14, 120:3, 123:2, 128:21, 138:3, 241:21 knows [3] - 218:15, 220:17, 232:3

L

L.A[1] - 3:4 **LA**[12] - 10:9, 34:25, 102:4, 195:17, 203:7, 203:13, 204:7, 209:15, 210:2, 216:14, 221:2, 221:5 Lack [1] - 183:12 lacks [5] - 29:1, 29:15, 31:19, 182:14, 228:8 Lancaster [1] - 191:14 landlord [2] - 93:18, 100:9 language [4] - 42:14, 42:15, 42:16, 208:16 LAPD [1] - 235:15 large [2] - 156:16, 158:2 last [21] - 9:3, 11:7, 14:1, 16:12, 31:11, 36:9, 57:25, 59:19, 61:25, 80:10, 84:19, 88:16, 105:14, 123:19, 124:22, 146:10, 149:15, 156:17, 168:3, 191:19, 202:7 late [2] - 7:22, 198:6 laughed [1] - 226:23 laughing [3] - 145:13, 145:19, 156:10 laughter [1] - 145:16 law [6] - 7:17, 120:14, 235:14, 240:18, 245:2, 249:23 laws [1] - 135:15 LCSW [1] - 232:22 leading [6] - 18:13, 21:12, 21:20, 169:8, 169:21, 208:21 learn [2] - 45:16, 177:2 least [1] - 8:1 leave [19] - 17:24, 69:15, 73:17, 76:5, 100:10, 119:19, 124:22, 124:23, 137:3, 137:13, 146:10, 174:15, 174:17, 174:23,

174:25, 215:16, 224:23, 231:5, 234:6 leaving [1] - 146:8 left [10] - 76:11, 76:12, 77:6, 95:4, 124:10, 153:4, 191:9, 191:13, 200:2, 200:9 Legislature [2] - 237:2, 240.4 legislature [1] - 243:13 **Lemus** [18] - 134:8, 134:12, 145:7, 145:11, 146:7, 146:16, 146:19, 146:21, 147:17, 147:23, 148:21, 151:25, 152:5, 154:21, 155:1, 172:16, 173:3, 188:5 length [1] - 17:7 lengthy [2] - 75:25, 149:4 Lennox [1] - 221:4 less [2] - 158:23, 175:17 letter [4] - 208:16, 232:17, 243:6 Letter [1] - 218:11 letters [1] - 132:10 letting [1] - 68:20 level [1] - 246:10 license [2] - 95:2, 95:3 Licensed [1] - 232:22 lied [1] - 200:23 lies [1] - 230:18 Lieutenant [64] - 10:22, 19:9, 19:17, 20:1, 26:21, 60:18, 74:3, 78:16, 79:1, 79:4, 79:11, 79:13, 79:25, 81:6, 81:10, 81:15, 82:6, 82:25, 83:14, 83:20, 84:23, 85:11, 85:23, 86:7, 86:15, 97:14, 97:25, 98:3, 98:22, 99:1, 107:16, 109:24, 110:13, 118:24, 119:5, 119:7, 119:11, 119:15, 120:17, 121:11, 124:19, 129:11, 129:13, 129:17, 154:17, 187:11, 201:20, 203:6, 203:9, 204:11, 204:14, 205:17, 205:23, 207:19, 209:20, 213:25, 215:7, 215:20, 216:3, 220:21, 222:13, 224:1, 230:17, 231:3 lieutenant [7] - 73:25, 74:2, 78:14, 78:16, 119:18, 129:14, 129:18 Lieutenant's [2] - 219:22, 220:17 life~ [9] - 77:24,~ 118:11,124:24, 137:10, 171:20, 171:22, 176:3, 176:18, 195.8

lifetime [1] - 248:20

light [1] - 168:12 likely [1] - 83:24 limited [4] - 178:16, 178:18, 236:24, 237:24 line [6] - 59:17, 93:8, 132:22, 133:21, 133:22, 209:14 lines [8] - 33:3, 51:18, 84:19, 85:21, 141:8, 150:24, 151:4, 208:18 Lisa [2] - 123:22, 183:10 Lisa's [1] - 184:2 list [1] - 115:4 listed [2] - 115:7, 115:10 listen [1] - 245:14 listened [1] - 137:8 listening [7] - 9:9, 139:8, 140:11, 146:9, 149:4, 176:1, 179:5 listing [1] - 48:25 Lit [1] - 191:17 Litigation [1] - 191:20 live [1] - 93:22 lived [1] - 98:10 livelihood [1] - 247:14 living [1] - 117:18 location [6] - 101:11, 101:14, 134:8, 159:21, 159:25, 160:11 locked [2] - 225:3, 225:5 log [2] - 161:2, 170:25 logo [1] - 221:6 long-term [1] - 234:2 long-time [1] - 248:5 Look [2] - 33:2, 67:19 look [25] - 10:25, 37:2, 37:6, 37:22, 56:22, 80:13, 80:17, 89:25, 94:20, 106:14, 106:15, 106:16, 165:3, 165:4, 165:15, 173:12, 174:1, 175:15, 178:24, 205:18, 209:17, 215:21, 217:14, 244:1, 249:24 looked [4] - 36:3, 114:13, 183:7, 251:5 looking [8] - 15:12, 48:24, 72:18, 89:24, 110:23, 165:9, 178:3, 243:23 looks [12] - 38:17, 42:23, 42:24, 80:13, 95:4, 96:15, 96:16, 97:14, 106:25, 111:10, 165:5, 171:2 LOS [2] - 1:2, 2:2 Los [8] - 1:17, 2:17, 6:1, 82:15, 129:1, 191:15, 203:16, 206:7 lose [4] - 137:18, 241:7, 247:13, 247:14 lost [2] - 95:24, 116:19

loud [2] - 86:2, 172:20

love [14] - 97:3, 135:1,

165:24, 166:12, 166:13, 167:15, 167:17, 167:18, 167:20, 168:4, 168:8, 169:19, 170:16, 170:19 loved [3] - 168:24, 169:5, 170:14 loyal [1] - 13:7 luck [1] - 76:11 lunch [5] - 117:3, 117:4, 117:5, 117:9

M

[1] - 202:10 ma'am [34] - 10:17, 10:23, 11:4, 12:1, 12:9, 14:5, 15:15, 17:19, 18:1, 18:22, 19:5, 19:18, 19:21, 20:4, 24:8, 25:5, 25:15, 25:25, 26:16, 26:22, 26:25, 28:3, 28:9, 29:21, 30:17, 30:19, 30:24, 31:9, 31:23, 63:21, 64:1, 64:15, 64:18, 64:24 mad [4] - 53:12, 162:6, 162:7, 186:9 mail [10] - 34:6, 34:11, 34:23, 35:6, 35:8, 37:15, 37:24, 43:2, 44:10, 46:23 mailed [1] - 49:1 mails [7] - 5:11, 34:18, 35:2, 35:22, 36:3, 37:20, 63:19 main [1] - 135:14 maintain [1] - 98:8 maintained [1] - 137:14 man [1] - 198:12 Management [2] - 191:17, 191:21 **MANDOYAN** [2] - 1:7, 2:7 Mandoyan [284] - 6:6, 11:9, 12:21, 17:15, 18:12, 21:9, 22:16, 23:10, 24:7, 25:7, 25:9, 25:23, 26:9, 26:14, 26:23, 27:24, 28:13, 28:15, 28:17, 29:22, 30:5, 30:14, 31:11, 31:12, 31:14, 32:3, 32:15, 32:21, 33:4, 33:12, 34:3, 34:7, 35:1, 37:19, 38:3, 38:13, 38:25, 39:5, 39:10, 39:14, 39:18, 39:24, 42:8, 43:3, 43:7, 43:11, 44:6. 44:9. 44:13. 44:25. 45:9. 45:19. 46:2. 46:18. 47:4, 47:19, 48:8, 48:18, 49:9, 54:13, 54:21, 55:7, 55:10, 55:18, 55:24, 56:18, 56:24, 57:4, 57:12, 57:18, 59:8, 59:20, 60:3, 60:14, 61:12, 61:17, 62:12, 63:7, 63:25, 65:18, 66:9, 66:24, 67:10, 68:2, 68:24, 74:20,

74:24, 75:9, 79:20, 81:21,

82:3, 82:11, 82:21, 83:4, 84:24, 85:12, 85:17, 86:8, 86:22, 87:2, 87:13, 87:16, 87:19, 87:25, 89:4, 89:11, 90:1, 90:17, 90:24, 91:6, 92:3, 92:18, 93:2, 93:5, 93:11, 94:4, 95:10, 95:14, 96:14. 96:16. 96:19. 97:5. 97:15, 99:5, 99:9, 99:25, 101:9, 102:12, 103:15, 103:20, 103:24, 105:3, 106:18, 107:1, 107:8, 108:10, 108:15, 109:2, 109:4, 109:10, 109:15, 110:1, 110:6, 110:14, 111:11, 112:8, 112:18, 113:18, 113:22, 114:4, 114:7, 115:20, 115:25, 116:4, 116:5, 116:11, 117:18, 117:25, 118:15, 118:18, 118:21, 119:3, 119:11, 119:16, 119:19, 120:21, 121:12, 121:16, 122:12, 123:14, 123:17, 123:20, 124:15, 125:5, 125:9, 125:17, 125:22, 125:25, 126:3, 126:8, 127:8, 128:16, 129:5, 130:25, 134:13, 138:1, 139:19, 139:23, 140:7, 140:17, 140:24, 141:13, 142:1, 142:6, 142:8, 142:10, 142:12, 142:16, 143:16, 143:21, 143:24, 144:9, 144:17, 144:22, 144:23, 145:24, 146:23, 147:24, 150:11, 153:17, 154:7, 155:17, 157:3, 157:16, 159:10, 160:18, 162:1, 162:10, 162:16, 162:20, 162:23, 163:1, 163:10, 163:21, 164:21, 173:9, 176:25, 177:3, 177:19, 178:8, 191:23, 191:25, 192:10, 192:13, 192:16, 194:21, 195:9, 196:4, 196:13, 197:11, 197:24, 200:20, 200:23, 203:10, 203:12, 203:16, 204:5, 204:9, 204:14, 204:19, 204:22, 205:1, 205:25, 206:2, 206:6, 207:1, 207:9, 208:9, 209:3, 209:11, 209:24, 210:1, 210:10, 210:23, 211:3, 211:25, 212:10, 212:24, 213:4, 213:7, 214:3, 216:7, 216:13, 217:16, 220:18, 221:12, 223:19, 224:7, 228:17, 228:23, 229:4, 230:3, 245:11, 247:11

Mandoyan's [18] - 5:20, 33:14, 42:15, 42:16, 51:20, 53:2, 59:22, 68:12, 153:25, 196:19, 209:14, 209:17, 209:21, 210:5, 210:8, 212:13, 214:6, 250:9 manipulating [3] - 26:24, 27:5. 39:18 manipulative [3] - 27:14, 27:16, 27:17 manner [1] - 206:22 manslaughter [1] - 248:25 [2] - 129:14, March [24] - 10:7, 13:2, 15:10, 15:22, 16:3, 16:17, 16:25, 17:12, 17:13, 29:12, 38:14, 42:18, 42:24, 42:25, 43:9, 43:16, 63:22, 65:15, 65:18, 66:3, 87:9, 87:20, 87:25, 177:11 Marco [9] - 147:23, 148:21, 151:1, 151:25, 152:4, 152:5, 154:21, 172:16, 188:5 mark [6] - 14:17, 36:16, 80:9, 94:12, 180:14, 215:10 **MARKED** [2] - 5:3, 5:9 marked [17] - 10:25, 36:10, 36:19, 36:25, 63:19, 80:5, 89:19, 94:16, 101:22, 106:7, 114:17, 181:2, 205:12, 205:16, 215:13, 224:2, 224:17 marks [2] - 200:2, 200:10 [8] - 88:14, 88:19, 89:13, 92:14, 185:4, 185:9, 186:14, 219:1 [1] - 88:14 [1] - 88:16 mascot [1] - 219:3 match [1] - 136:12 material [2] - 212:2, 233:24 materials [1] - 238:5 **MATTER** [2] - 1:6, 2:6 matter [10] - 6:5, 7:17, 100:7, 109:5, 180:24, 195:16, 222:8, 237:8, 245:17, 250:5 [5] - 30:18, 74:14, 120:2, 176:24, 177:2 MDC [4] - 194:3, 194:5, 194:7, 196:8 **MDT** [1] - 160:9 meal [2] - 198:1, 198:4 mean [50] - 13:11, 13:12,

16:16, 21:21, 47:10, 49:21,

56:2, 59:9, 70:23, 72:7,

75:25, 90:6, 90:9, 91:16,

92:9, 104:3, 104:14, 104:15, 104:16, 110:19, 113:8, 115:3, 121:25, 124:18, 134:4, 135:8, 135:17, 137:11, 146:4, 158:12, 158:23, 161:4, 170:1, 170:2, 175:24, 186:2. 187:5. 187:19. 192:18, 212:7, 220:7, 220:8, 227:6, 231:17, 232:5, 232:6, 233:15, 239:5, 244:15, 250:1 means [3] - 49:15, 110:19, 251:20 meant [3] - 128:9, 147:5, 168:14 meat [1] - 135:16 medical [1] - 244:8 meet [8] - 50:7, 121:7, 142:21, 151:19, 176:7, 178:17, 243:4, 246:1 meeting [22] - 49:25, 50:15, 50:16, 50:17, 50:20, 72:24, 73:1, 73:2, 73:4, 73:9, 73:11, 73:13, 73:16, 141:13, 144:17, 146:13, 147:11, 148:15, 149:3, 151:21, 174:5, 179:9 Melrose [1] - 160:15 member [11] - 70:25, 128:20, 209:7, 216:22, 217:1, 217:17, 219:7, 219:9, 220:11, 220:13, 223:9 memo [10] - 216:11, 224:17, 224:19, 224:24, 226:3, 227:3, 227:20, 228:12, 228:16, 228:22 Memorandum [1] - 5:21 memorandum [12] - 208:4, 212:22, 213:17, 222:25, 223:7, 225:15, 225:20, 227:16, 228:4, 228:19, 230:5, 230:16 memories [1] - 225:20 memory [4] - 21:25, 22:5, 22:6, 171:14 men [1] - 59:17 mental [3] - 76:6, 239:12, 240:16 mention [3] - 24:25, 28:20, 178:21 mentioned [5] - 21:1, 24:24, 35:23, 55:5, 166:4 mentor [1] - 195:15 meridian [1] - 115:17 message [41] - 23:11, 23:13, 23:15, 23:24, 52:11, 52:13, 52:14, 52:17, 53:7, 77:12,

90:10, 90:23, 92:6, 94:3, 95:7, 95:12, 95:25, 97:8, 101:18, 102:11, 113:18, 114:7, 116:1, 156:25, 160:9, 161:14, 162:7, 168:6, 184:11, 184:24, 194:13, 196:8 messages [90] - 51:3, 52:22, 52:25, 53:2, 53:22, 54:3, 54:4, 54:6, 54:12, 54:22, 55:11, 55:18, 55:21, 55:23, 56:13, 56:16, 56:19, 57:5, 57:13, 57:16, 58:25, 59:4, 59:12, 59:16, 60:19, 60:24, 61:10, 74:9, 74:13, 74:17, 77:18, 77:21, 78:8, 79:18, 90:8, 91:23, 91:25, 93:1, 93:12, 93:14, 94:8, 98:24, 99:22, 100:24, 109:9, 109:11, 116:4, 118:7, 118:10, 118:19, 118:25, 119:2, 119:17, 119:21, 119:24, 120:2, 120:23, 121:18, 122:17, 122:18, 122:24, 125:1, 125:5, 134:14, 135:1, 137:5, 139:5, 139:25, 141:19, 141:20, 141:23, 142:3, 145:23, 146:24, 157:7, 158:24, 158:25, 162:21, 175:18, 175:19, 176:6, 176:12, 176:16, 177:13, 177:17, 177:20, 184:15, 194:1, 194:9 Messages [3] - 5:13, 5:14, 5:15 messed [1] - 227:17 met [10] - 26:10, 72:23, 121:9. 125:16. 141:25. 143:5. 143:10. 147:10. 147:18, 173:6 method [1] - 244:6 MICHAEL [3] - 3:10, 190:14, 190:21 Michael [2] - 4:11, 190:21 [1] - 3:12

[1] - 3:12

middle [7] - 6:10, 51:15,
56:23, 76:12, 150:25,
156:6, 227:20

midnight [1] - 165:21

might [30] - 7:7, 13:11,
13:18, 102:22, 104:4,
104:19, 112:3, 121:25,
122:16, 127:2, 130:1,
132:19, 146:20, 155:3,
161:6, 167:24, 220:16,
221:21, 223:12, 234:11,
235:2, 235:3, 235:6,
238:13, 238:25, 244:14,

245:5, 249:16 mill [1] - 210:22 mind [5] - 21:15, 136:12, 221:9, 222:1, 241:5 mine [3] - 58:15, 137:11, 215:18 minimal [1] - 187:7 minute [5] - 20:10, 84:1, 106:20, 111:4, 136:20 minutes [11] - 6:25, 50:24, 52:17, 105:8, 107:9, 135:25, 136:1, 136:2, 136:23, 171:16, 190:7 mischaracterize [1] - 135:3 misconduct [3] - 212:1, 217:23, 230:2 misleading [2] - 135:2, 230:21 missed [1] - 85:6 missing [3] - 180:6, 205:10, 215:18 misstate [1] - 146:4 misstates [5] - 111:14, 133:1, 141:4, 146:2, 152:23 misstating [1] - 107:25 mistaken [3] - 13:5, 16:22, 36:10 mitigating [1] - 249:1 mixing [1] - 147:9 mobile [1] - 194:7 mom [1] - 183:17 moment [1] - 174:1 Monday [1] - 72:13 money [1] - 246:20 month [6] - 14:1, 41:6, 66:4, 104:24, 110:11, 135:10 months [14] - 12:6, 14:1, 14:2, 29:11, 79:21, 137:9, 138:22, 138:25, 147:19, 167:9, 177:18, 203:2, 203:3, 223:7 [1] - 202:1

[11] - 4:12, 201:20, 202:9, 202:17, 205:17, 205:23, 213:25, 215:20, 222:13, 230:17, 231:3

Moore's [1] - 5:5
morning [26] - 6:5, 6:8, 9:23, 9:24, 43:1, 69:10, 69:23, 71:19, 71:20, 102:25, 105:8, 106:25, 107:8, 108:15, 110:2, 110:21, 112:18, 115:14, 126:1, 126:8, 163:20, 167:14, 171:1, 195:5, 249:25, 251:21

mornings [2] - 193:8, 214:7

most [7] - 104:14, 141:8,

166:21, 167:11, 171:25,

77:13, 83:2, 83:3, 83:6,

83:9, 89:4, 89:15, 89:25,

187:7, 239:5 mostly [3] - 26:11, 34:3, 193:10 motherfucker [1] - 162:23 $\textbf{motion} \ [11] \ \textbf{--} \ 7 \textbf{:} 8, \ 7 \textbf{:} 9, \ 38 \textbf{:} 9, \\$ 93:23, 100:12, 124:1, 140:13, 150:3, 153:6, 242:13, 244:18 motion's [1] - 124:6 motivating [1] - 123:11 motive [1] - 58:4 mouth [1] - 155:23 move [10] - 18:24, 45:5, 70:18, 124:23, 137:10, 171:20, 171:21, 171:22, 241:8 moved [1] - 13:1 movie [1] - 109:1 moving [2] - 156:14, 176:4 **MR** [182] - 6:14, 6:19, 6:23, 7:14, 8:10, 14:20, 14:23, 15:2, 17:16, 18:13, 18:25, 21:12, 22:25, 29:1, 29:15, 30:9, 31:18, 32:7, 33:10, 33:23, 34:2, 35:17, 36:5, 36:9, 36:14, 36:16, 36:23, 38:9, 38:12, 40:12, 40:20, 44:5, 45:8, 49:7, 49:16, 49:17, 53:5, 53:20, 55:2, 55:16, 56:14, 63:10, 68:5, 69:2, 69:11, 69:15, 69:21, 70:16, 71:15, 71:18, 80:2, 80:8, 80:14, 80:16, 81:1, 86:3, 87:8, 89:10, 89:17, 89:22, 90:16, 93:23, 94:1, 94:12, 94:19, 96:4, 100:12, 100:22, 101:20, 101:25, 102:2, 105:2, 105:20, 106:9, 106:10, 108:8, 112:6, 113:17, 114:15, 114:20, 114:22, 116:19, 116:23, 117:14, 117:16, 119:8, 119:9, 123:10, 123:13, 124:1, 124:14, 133:8, 134:7, 134:21, 136:1, 137:21, 137:22, 140:13, 140:15, 141:10, 146:12, 147:4, 147:12, 147:14, 148:8, 148:10, 150:3, 150:9, 151:7, 151:9, 153:1, 153:6, 153:12, 153:13, 156:1, 156:4, 156:13, 157:20, 157:25, 158:1, 161:13, 163:14, 163:18, 164:8, 164:17, 168:10, 169:8, 169:21, 180:2, 180:10, 180:16, 180:18, 181:11, 182:14, 183:11, 185:23, 187:25, 188:2, 189:17, 190:3,

190:25, 191:2, 191:22, 194:6, 197:16, 200:18, 201:11, 201:14, 201:20, 202:13, 202:16, 205:8, 205:14, 205:15, 205:22, 208:24, 209:1, 211:11, 211:12, 212:21, 213:19, 214:14. 214:24. 216:17. 216:25, 217:7, 218:6, 218:21, 228:8, 231:1, 231:11, 231:22, 231:25, 232:10, 236:1, 236:8, 236:10, 242:16, 242:24, 245:16, 250:21, 251:25 **MS** [153] - 6:9, 6:13, 6:22, 7:3, 7:11, 8:8, 8:14, 8:16, 9:19, 9:22, 10:2, 13:16, 14:16, 14:22, 14:25, 15:6, 15:11, 15:22, 15:24, 17:10, 17:20, 18:16, 19:6, 21:6, 22:14, 23:5, 27:23, 29:3, 29:10, 29:23, 30:7, 30:13, 31:21, 32:10, 32:13, 33:6, 33:18, 33:21, 36:22, 40:6, 45:2, 49:4, 55:12, 55:25, 63:13, 63:17, 65:11, 68:7, 68:11, 69:5, 69:13, 69:25, 70:2, 70:10, 70:20, 70:24, 80:10, 80:13, 85:24, 107:24, 111:14, 111:18, 111:22, 113:14, 119:6, 123:6, 133:1, 141:4, 146:1, 146:25, 149:11, 150:7, 152:23, 164:9, 165:6, 167:24, 168:2, 168:16, 168:18, 169:10, 169:14, 170:10, 170:22, 170:23, 180:1, 180:14, 180:17, 180:21, 181:4, 181:7, 181:16, 182:20, 182:24, 183:19, 184:9, 187:3, 187:21, 189:19, 189:25, 197:19, 197:22, 200:13, 201:15, 208:20, 211:6, 212:4, 213:21, 213:24, 214:15, 214:18, 215:4, 215:6, 215:10, 215:15, 215:19, 216:20, 217:4, 217:12, 217:19, 217:22, 218:1, 218:12, 220:16, 222:9, 222:12, 227:5, 227:10, 229:16, 230:24, 231:8, 231:14, 232:5, 232:14, 232:20, 232:25, 233:21, 233:23, 234:20, 235:11, 236:6, 236:9, 239:17, 239:19, 241:12, 241:15, 241:25, 242:5, 242:21, 244:17, 250:2, 250:4, 250:14, 251:22

multiple [2] - 91:23, 183:11

murder [3] - 237:13, 243:8, 249:1 must [5] - 85:10, 107:3, 108:17, 222:2, 240:9 mutual [1] - 183:9

Ν

N's [1] - 9:5 name [20] - 8:13, 9:1, 9:4, 9:8, 33:15, 47:5, 47:8, 47:12, 47:16, 47:23, 48:3, 64:20, 88:16, 130:10, 132:5. 190:20. 202:7. 202:9, 220:3, 253:14 named [1] - 188:24 names [2] - 48:20, 48:21 narcotics [1] - 195:17 narcotics-wise [1] - 195:17 narrative [8] - 84:20, 93:24, 96:14, 96:17, 170:9, 173:25, 179:20, 179:24 Narrative [1] - 5:19 narrow [1] - 8:3 nature [12] - 42:5, 77:25, 88:2, 104:11, 192:25, 206:13, 208:1, 223:16, 227:18, 236:12, 239:11, 248.6 NCCF [1] - 191:8 necessarily [5] - 7:8, 58:5, 58:17, 166:25, 209:8 necessary [2] - 225:22, 245.4 need [14] - 43:21, 48:7, 52:18, 70:23, 100:23, 137:10, 159:20, 160:5, 171:22, 179:15, 206:20, 241:13, 243:24, 249:3 needed [8] - 28:18, 28:20, 45:18, 75:7, 77:15, 77:16, 134:4, 201:8 needs [4] - 7:21, 23:1, 43:25, 48:5 negative [4] - 201:9, 221:14, 221:15, 222:4 negatively [1] - 200:25 **negativity** [1] - 221:9 never [61] - 6:13, 19:25, 24:24, 26:1, 26:5, 28:19, 28:23, 31:6, 31:15, 39:6, 47:6, 54:25, 55:6, 57:7, 57:10, 60:2, 62:15, 62:17, 62:18, 62:20, 62:25, 63:7, 67:9, 67:23, 74:25, 80:22, 85:14, 85:19, 86:11, 89:12, 97:21, 98:8, 98:9, 98:18, 99:19, 108:6, 109:4, 113:12, 127:24, 128:5,

154:5, 160:6, 166:6, 188:3, 195:18, 196:7, 196:8, 196:23, 201:9, 218:23, 232:23, 237:7, 244:9, 244:11, 246:6, 248:8, 251:17 new [9] - 21:3, 40:2, 45:16, 64:7, 64:11, 203:22, 204:3, next [15] - 6:23, 8:12, 36:17, 36:25, 78:18, 89:18, 94:12, 106:24, 110:24, 180:15, 180:19, 181:15, 201:19, 215:11, 231:18 nice [2] - 20:24, 231:6 night [6] - 31:11, 39:7, 76:4, 104:15, 183:20 nightclub [2] - 109:1, 109:5 nights [1] - 108:11 nine [1] - 202:24 NO [2] - 1:9, 2:9 nobody [4] - 141:15, 176:17, 183:18, 249:2 noncriminal [1] - 242:3 none [8] - 91:14, 137:14, 137:15, 208:1, 213:9, 225:1, 228:18, 248:6 nonresponsive [6] - 38:10, 93:24, 100:13, 124:2, 140:14, 148:8 noon [5] - 70:12, 116:18, 116:22, 232:9 normal [3] - 102:19, 104:16, 104:19 North [1] - 121:2 **nose** [3] - 52:11, 52:15, 53:8 notate [3] - 207:16, 209:12, 225:21 noted [2] - 149:14, 164:20 notes [3] - 163:15, 217:14, 232:12 nothing [20] - 21:3, 23:16, 24:2, 63:10, 64:16, 67:7, 67:20, 114:5, 171:23, 184:7, 189:17, 200:6, 201:11, 213:19, 218:8, 246:5, 247:16, 250:1, 251:8, 251:15 noticed [1] - 164:19 notified [1] - 230:15 notify [1] - 230:4 November [5] - 13:2, 16:5, 16:12, 16:17, 216:15 nowhere [1] - 171:21 number [28] - 6:6, 25:4, 25:13, 27:25, 33:15, 33:19, 33:20, 35:19, 35:25, 52:16, 55:4, 55:6, 66:13, 83:4, 83:5, 105:12, 105:13, 106:11, 107:4, 111:20,

136:16, 137:17, 149:3,

116:12, 150:6, 160:19, 171:24, 172:2, 177:10 numbers [2] - 24:1, 178:4 numerous [2] - 82:4, 82:9

0 o'clock [6] - 102:24, 108:22, 117:1, 117:6, 251:22 oath [1] - 117:21 object [16] - 40:6, 45:2, 49:4, 55:25, 85:24, 107:24, 111:14, 113:14, 133:1, 141:4. 146:1. 146:25. 152:23. 208:20. 211:6. 212:4 objection [27] - 6:15, 17:16, 18:13, 18:25, 21:12, 22:25, 27:10, 27:20, 29:1, 30:9, 31:18, 32:7, 33:10, 56:6, 69:2, 148:8, 149:14, 168:10, 169:8, 169:12, 182:14, 183:11, 185:23, 212:20, 214:24, 216:17, 228.8 objections [3] - 8:6, 242:11, 248:2 [3] - 82:22, 83:10, 161:19 [2] - 83:11, 161:21 1] - 82:21 **obligation** [1] - 52:7 obtaining [1] - 86:8 obvious [1] - 247:3 **obviously** [1] - 218:1 occasion [8] - 73:20, 125:8, 163:4, 188:4, 197:23, 204:5, 211:16, 211:20 occasional [1] - 201:5 occasions [5] - 88:5, 95:17, 125:7, 194:25, 211:13 occurred [9] - 95:25, 96:23, 110:15, 136:17, 171:7, 179:7, 198:4, 214:8, 251:14 occurrence [2] - 236:20, 251:1 occurring [1] - 160:14 October [2] - 13:24, 253:15 **OF** [11] - 1:2, 1:6, 1:6, 1:9, 1:16, 2:2, 2:6, 2:6, 2:9 offensive [1] - 118:8 offer [3] - 8:5, 217:15, 239:1 offered [9] - 38:8, 43:13, 45:12, 144:3, 180:25, 219:12, 236:19, 239:14, 239:19 offering [2] - 245:7, 250:25

Office [1] - 5:20

office [9] - 73:7, 205:24,

206:2, 206:3, 206:24, 207:13, 207:15, 208:3, 247.2 officer [12] - 43:13, 45:13, 47:16. 48:9. 48:15. 64:20. 64:21, 147:11, 147:23, 149:23, 172:23, 248:1 Officer [36] - 2:20, 8:22, 36:20, 71:9, 80:6, 89:20, 94:17, 101:23, 106:8, 114:18, 134:8, 134:12, 145:7, 145:11, 146:7, 146:16, 146:19, 146:21, 147:17, 151:25, 155:1, 173:3, 181:3, 188:5, 189:24, 190:16, 191:15, 202:3, 203:17, 203:20, 203:25, 204:2, 204:10, 205:13, 213:5, 215:14 **OFFICER** [297] - 1:3, 2:3, 6:4, 6:10, 6:15, 7:6, 7:12, 7:19, 8:9, 8:12, 8:15, 8:17, 8:25, 9:5, 9:8, 9:16, 10:1, 13:10, 15:20, 15:23, 16:11, 16:16, 16:23, 17:2, 17:4, 17:6, 17:18, 18:14, 19:2, 20:10, 20:22, 20:25, 21:3, 21:14, 22:7, 22:13, 23:2, 27:6, 27:9, 29:2, 29:5, 29:18, 30:2, 30:11, 31:20, 32:8, 32:11, 33:11, 33:22, 35:10, 36:8, 36:11, 36:15, 36:21, 40:9, 43:18, 43:24, 45:4, 49:6, 49:14, 53:3, 53:6, 53:10, 53:15, 53:19, 55:13, 56:2, 56:9, 63:11, 63:14, 65:13, 65:17, 65:21, 66:5, 66:8, 66:11, 66:16, 66:21, 66:25, 67:3, 67:7, 67:11, 67:14, 67:18, 68:3, 68:6, 69:4, 69:6, 69:9, 69:17, 69:22, 70:1, 70:3, 70:6, 70:9, 70:11, 70:17, 70:22, 71:1, 71:12, 80:4, 80:12, 86:1, 87:5, 89:7, 89:21, 90:4, 90:12, 94:18, 95:23, 100:14, 100:19, 101:24, 104:7, 104:10, 104:13, 104:18, 104:22, 105:22, 105:24. 106:1. 106:5. 108:2, 111:16, 111:21, 111:24, 113:16, 114:19, 116:17, 116:21, 116:24, 117:8, 117:10, 117:15, 123:8, 124:3, 124:6, 124:9, 124:11, 133:3, 134:2, 134:6, 134:20, 134:22, 135:20, 135:23, 136:2, 136:9, 136:24, 137:19, 141:6, 146:3, 147:2, 147:5,

149:23, 150:5, 150:8, 151:5, 151:8, 152:25, 153:8, 155:24, 156:2, 156:12, 157:18, 160:22, 161:1, 161:4, 161:7, 161:12, 163:16, 164:11, 164:14, 164:18, 165:3, 165:8. 165:11. 165:15. 165:18, 165:20, 166:1, 166:9, 166:17, 166:23, 167:4, 167:13, 167:21, 167:25, 168:14, 168:17, 169:9, 169:13, 169:23, 170:13, 179:12, 179:23, 180:9, 180:12, 180:23, 181:5, 181:9, 181:14, 182:16, 182:21, 183:13, 183:22, 183:25, 184:4, 184:8, 185:25, 186:5, 186:7, 186:17, 186:21, 186:25, 187:23, 189:18, 189:20, 190:1, 190:4, 190:9, 190:19, 190:23, 197:17, 200:14, 201:12, 201:16, 201:21, 202:6, 202:11, 205:7, 205:9, 205:20, 208:22, 211:8, 212:6, 213:20, 215:1, 215:5, 216:19, 217:9, 217:13, 217:20, 217:23, 219:4, 220:20, 220:25, 221:8, 221:11, 221:15, 221:21, 221:24, 222:11, 227:3, 227:6, 228:11, 228:15, 228:20, 228:25, 229:6, 229:12, 229:14, 230:25, 231:2, 231:9, 231:12, 231:15, 231:23, 232:2, 232:8, 232:15, 232:21, 233:1, 233:22, 234:14, 234:24, 235:24, 238:10, 239:18, 241:10, 241:13, 241:19, 242:1, 242:6, 242:19, 242:22, 243:22, 245:7, 249:6, 250:3, 250:13, 251:19, 251:23, 252:1 officer's [1] - 64:20 Officers [1] - 172:10 officers [2] - 48:5, 148:2 official [1] - 50:4 officially [2] - 127:4, 166:5 often [7] - 24:17, 24:18, 26:3, 46:10, 46:12, 87:24, 185:18 ol' [2] - 151:1, 152:4 old [1] - 33:20 omitted [2] - 155:5, 180:11 once [5] - 8:6, 24:13, 185:21, 198:1, 233:8

one [41] - 22:21, 24:18, 25:8, 26:10, 29:22, 34:21, 65:8, 65:23, 66:1, 68:8, 76:4, 85:11, 91:23, 95:12, 95:19, 106:6, 111:4, 117:1, 122:11, 125:8, 144:5, 144:15, 145:16, 164:18, 172:7, 176:11, 176:17, 176:19, 177:22, 184:11, 184:12, 191:19, 195:7, 197:15, 198:3, 215:17, 217:3, 233:14, 239:1, 240:18, 240:20 one-hour [1] - 117:1 one-page [1] - 184:11 ongoing [3] - 19:24, 178:7, 178:13 onward [1] - 29:9 open [4] - 10:25, 80:7, 164:22, 164:23 opened [1] - 183:7 Operation [1] - 130:15 Operations [3] - 230:4, 230:15, 230:16 opinion [18] - 27:17, 27:18, 176:17, 176:19, 199:6, 199:19, 199:20, 199:25, 200:3, 204:13, 212:2, 212:18, 216:23, 220:17, 221:13, 239:22, 244:7, 244:23 opinions [2] - 246:9, 247:18 opportunity [5] - 11:5, 80:17, 147:15, 151:24, 247:10 opposed [2] - 45:10, 209:14 **opposition** [3] - 7:13, 7:14, 7:16 **Ops** [1] - 132:21 order [65] - 36:17, 37:1, 89:18, 94:12, 117:25, 118:6, 121:2, 121:14, 122:7, 122:13, 122:21, 123:12, 125:16, 126:7, 126:11, 126:17, 126:22, 127:6, 127:12, 127:14, 127:15, 127:19, 128:2, 128:3, 128:7, 128:11, 128:17, 129:10, 130:16, 130:22, 131:2, 131:7, 131:9, 131:13, 131:23, 132:3, 133:24, 137:17, 137:24, 138:16, 138:23, 139:22, 140:10, 140:21, 141:2, 141:8, 141:16, 142:6, 142:13, 142:16, 143:16, 144:21, 178:1, 178:6, 178:15, 179:3, 179:13, 179:25, 180:15, 180:19, 205:6, 205:10, 206:22, 215:12, 225:22

147:8, 149:13, 149:20,

orders [2] - 121:21, 122:1 original [1] - 180:10 otherwise [2] - 170:15, 236:25 outcome [2] - 212:19, 253:13 outgoing [3] - 110:25, 111:20, 112:4 outline [1] - 44:21 outside [8] - 26:8, 59:9, 175:25, 183:8, 189:15, 192:18, 192:20, 248:10 overall [1] - 209:5 overlap [1] - 65:22 overlapped [2] - 66:1, 66:3 overrule [1] - 56:5 overruled [14] - 17:18, 18:14, 29:19, 30:11, 33:11, 40:11, 55:14, 86:1, 133:4, 141:6, 146:3, 152:25, 183:13, 185:25 overtime [10] - 32:17, 32:21, 32:22, 161:18, 193:9, 193:10, 193:14, 214:13, 214:20, 214:21 own [13] - 22:1, 42:11, 44:23, 44:24, 126:12, 128:5, 128:14, 129:8, 133:19, 137:6, 170:9, 225:5, 244:25

Ρ

p.m [13] - 2:19, 42:24, 94:25, 102:7, 102:23, 109:16, 115:7, 115:17, 116:12, 193:8, 193:14, 214:8, 252:3 p.m.'s [1] - 193:11 packet [1] - 126:18 page [65] - 19:14, 19:15, 19:16, 22:4, 37:10, 37:13, 37:22, 42:14, 42:23, 42:24, 43:2, 51:9, 51:12, 51:14, 51:18, 51:25, 52:3, 56:21, 56:23, 57:22, 61:24, 62:1, 62:2, 62:3, 62:22, 63:2, 63:4, 82:20, 83:16, 84:18, 94:25, 96:16, 97:1, 106:6, 150:20, 151:5, 151:7, 151:10, 156:3, 156:4, 156:5, 156:11, 156:14, 156:15, 157:21, 158:3, 158:20, 165:4, 165:5, 171:2, 172:14, 173:8, 173:13, 173:23, 173:24, 173:25, 178:3, 178:24, 184:11, 184:12, 224:3 pages [9] - 37:1, 37:6, 37:9, 80:19, 94:14, 94:20, 180:5, 205:9, 205:10

paginated [1] - 37:1 paid [1] - 43:12 **Palmdale** [1] - 191:14 paper [1] - 179:16 paperwork [1] - 41:25 parade [2] - 32:18, 32:20 paragraph [9] - 57:21, 156:16, 157:22, 158:2, 172:18, 173:13, 173:25, 227:20, 243:10 parameters [1] - 243:20 parking [2] - 160:15, 187:17 part [30] - 8:4, 22:23, 28:5, 29:16, 40:3, 40:10, 41:8, 41:25, 47:24, 62:5, 104:14, 121:23, 122:14, 141:8, 146:22, 150:16, 166:21, 167:12, 168:4, 179:24, 180:10, 187:7, 198:9, 213:10, 215:7, 218:10, 219:6, 228:1, 239:6, 248:22 particular [15] - 39:1, 83:8, 85:5, 125:8, 139:18, 154:3, 154:4, 154:6, 156:3, 170:11, 196:1, 209:3, 213:17, 228:17, 243:19 particularly [1] - 21:21 parties [1] - 60:5 parting [1] - 250:2 partner [10] - 57:18, 58:6, 58:13, 58:17, 234:22, 239:11, 239:23, 241:23, 247:15, 250:12 partnered [2] - 14:11, 16:1 partners [4] - 25:10, 113:9, 186:10, 187:5 party [2] - 82:1, 82:2 Party [1] - 217:2 pass [1] - 219:2 passed [2] - 47:2, 138:7 password [3] - 160:19, 161:5, 161:10 past [5] - 45:6, 88:10, 101:5, 138:25, 213:3 patience [2] - 201:17, 213:25 patient [1] - 9:10 Patrol [3] - 188:5, 203:21, 233:10 patrol [22] - 10:11, 40:23, 41:1, 41:4, 41:9, 41:13, 41:15, 46:20, 84:3, 84:7, 121:23, 122:4, 122:14, 160:7, 193:25, 194:11, 196:6, 197:12, 202:22, 203:14, 204:3, 204:18 patrol-experienced [1] -204:3

patrol-related [1] - 204:18

pattern [2] - 235:20, 250:10

patterns [2] - 234:1, 240:14 pause [1] - 163:17 pay [1] - 186:22 PD [2] - 131:14, 142:7 penalty [2] - 138:10, 230:18 pending [2] - 111:8, 150:4 people [17] - 42:4, 104:16, 104:19, 115:4, 137:5, 185:11, 185:15, 186:10, 195:3, 195:7, 195:19, 206:20, 218:15, 233:18, 235:14, 243:15, 247:17 **People** [2] - 234:15, 236:16 people's [1] - 222:3 Per [1] - 51:20 **per** [1] - 53:2 percent [1] - 245:10 perceptions [1] - 239:13 percipient [1] - 170:7 perhaps [2] - 7:23, 169:25 period [16] - 11:23, 12:12, 12:16, 13:9, 15:13, 15:16, 17:11, 46:16, 63:24, 77:17, 78:5, 144:9, 177:16, 192:9, 207:17, 210:4 periods [1] - 65:21 perjury [1] - 138:10 permit [1] - 7:15 permitted [3] - 169:11, 170:8, 237:18 person [17] - 7:15, 7:17, 52:21, 53:1, 122:25, 125:6, 125:8, 125:10, 195:4, 204:19, 204:22, 209:6, 220:2, 245:21, 245:22, 246:6, 246:24 personal [16] - 17:2, 17:8, 21:25. 48:11. 77:1. 81:5. 199:21, 207:21, 208:1. 208:4, 208:9, 209:14, 209:16, 219:13, 219:18, 249:14 personally [3] - 56:5, 123:22, 140.7 personnel [2] - 203:23, 211:14 perspective [1] - 204:14 Peter [1] - 3:15 petition [1] - 245:19 phases [2] - 41:12, 41:15 phone [95] - 25:4, 25:17, 25:20, 25:23, 26:4, 26:8, 26:11, 26:12, 27:25, 33:13, 33:14. 33:15. 33:19. 33:20. 49:9. 55:4. 55:6. 61:6. 66:13. 66:14. 68:13. 79:17. 82:5, 82:9, 82:11, 83:4, 83:5, 86:18, 89:5, 104:2, 105:12, 105:13, 106:17, 106:20, 106:25, 107:1,

107:2, 107:4, 107:7, 109:11, 110:1, 111:22, 115:24, 116:3, 116:11, 121:10, 125:6, 125:8, 125:25, 136:11, 153:17, 153:18, 154:22, 160:19, 161:1, 162:24, 163:24, 163:25. 170:25. 171:10. 177:8, 177:10, 177:13, 177:14, 183:9, 186:13, 195:19, 198:21, 205:1, 206:4, 206:20, 207:1, 207:3, 207:5, 207:8, 207:10. 207:20. 208:5. 208:10, 208:13, 209:7, 209:13, 209:14, 209:16, 209:17, 209:18, 222:17, 222:24, 227:4, 227:8, 227:11, 228:10, 228:17, 230:3 Phone [1] - 5:16 photograph [1] - 95:3 photographs [1] - 61:9 phrased [2] - 38:10, 147:13 physical [3] - 239:12, 240:17, 240:20 pick [1] - 124:10 picked [1] - 126:18 picture [4] - 28:12, 32:16, 33.1 pieces [1] - 98:6 pin [1] - 12:22 [8] - 232:16, 232:21, 238:4, 246:4, 247:6, 250:6, 251:4, 251:11 [2] - 232:17, 235:12 place [18] - 12:13, 29:6, 50:3, 64:20, 73:4, 73:7, 88:24, 93:7, 93:21, 103:7, 103:12, 139:10, 139:14, 153:19, 171:10, 227:25, 237:7, 253:6 places [1] - 175:12 plain [1] - 233:10 plate [1] - 95:2 plea [1] - 124:23 [44] - 51:1, 52:25, 53:1, 53:16, 53:21, 53:23, 54:2, 54:6, 54:8, 54:11, 54:18, 54:24, 55:11, 55:19, 55:23, 56:15, 58:24, 59:3, 59:13, 59:16, 60:9, 60:20, 60:25, 74:14, 74:17, 74:20, 75:1, 75:5, 75:8, 75:11, 75:12, 76:15, 77:13, 120:3, 121:5, 121:7, 126:16, 142:15, 143:20, 143:25, 144:6, 144:8, 144:19, 144:23 POE [10] - 5:12, 78:19, 78:20, 78:21, 79:6, 79:11, 83:15,

97:14, 99:2, 230:6 point [70] - 22:21, 24:18, 24:25, 25:3, 27:17, 30:25, 34:21, 36:6, 39:9, 41:12, 51:3. 54:15. 57:11. 60:8. 61:16, 61:20, 65:8, 66:2, 69:3, 72:9, 72:20, 72:24, 73:16, 74:9, 74:12, 74:19, 75:15, 78:20, 93:24, 97:16, 100:13, 101:6, 109:20, 120:16, 124:2, 128:3, 130:2, 133:23, 144:11, 145:16, 148:9, 150:4, 158:24, 159:9, 166:13, 175:18, 177:2, 177:7, 182:15, 183:12, 192:12, 192:22, 193:5, 194:14, 203:15, 206:24, 207:12, 213:17, 216:5, 216:18, 218:22, 221:5, 231:19, 239:4, 239:6, 240:24, 241:16, 247:8, 250:7, 250:17 pointed [1] - 240:7 points [1] - 238:11 police [39] - 99:19, 99:25, 120:12, 130:3, 130:6, 130:19, 130:20, 131:5, 132:6, 132:18, 132:24, 133:11, 133:16, 133:23, 134:5, 134:23, 134:25, 135:2, 136:25, 143:23, 146:22, 148:2, 148:11, 149:6, 149:8, 149:10, 150:6, 151:24, 154:10, 164:5, 164:19, 165:12, 166:2, 166:18, 166:19, 167:10, 181:18, 189:14 Police [25] - 74:7, 120:18, 131:11, 131:20, 132:7, 133:14, 133:18, 134:17, 142:5, 142:10, 142:25, 143:3, 145:25, 146:15, 147:17, 147:21, 150:11, 151:17, 154:22, 159:8, 172:16, 176:21, 189:7, 241:4, 247:2 Policies [1] - 203:22 policies [1] - 203:23 policy [5] - 64:17, 118:16, 217:8, 218:10, 230:8 Policy [1] - 78:21 political [1] - 217:5 poorly [2] - 38:10, 147:13 poorly-phrased [1] - 38:10 portion [2] - 148:7, 167:7 portions [1] - 225:21 portrays [1] - 135:7 position [13] - 84:15, 84:25, 85:8, 85:13, 85:15, 85:18,

86:8, 86:12, 191:16, 203:24, 204:2, 216:24, 217.6 **POSITION** [2] - 1:9, 2:9 positive [2] - 148:6, 221:15 possible [9] - 90:9, 90:10, 94:6, 100:1, 103:12, 112:14, 161:6, 162:6 possibly [3] - 119:14, 131:10, 188:18 post [2] - 40:15, 101:2 post-breakup [1] - 101:2 potatoes [1] - 135:16 potential [1] - 219:5 pounding [1] - 135:19 power [1] - 235:19 practice [3] - 48:4, 64:14, 65:5 **pre** [1] - 36:25 pre-marked [1] - 36:25 predicate [2] - 236:13, 245:20 preface [1] - 85:5 prejudice [1] - 219:5 prejudicial [2] - 219:11, 220.9 Prell [1] - 218:9 premarked [1] - 205:4 preparation [1] - 146:23 prepare [1] - 232:4 preplanned [1] - 112:20 prescribe [1] - 218:3 presence [2] - 148:12, 148.14 present [11] - 3:14, 59:7, 64:22, 73:11, 112:8, 142:12, 142:14, 143:24, 247:20, 248:6, 248:7 presented [2] - 50:9, 219:20 prestigious [1] - 203:24 pretty [3] - 129:14, 148:6, 161:16 prevent [1] - 86:23 prevented [6] - 84:25, 85:12. 89:12. 113:11. 141:15. 249:2 previous [2] - 78:15, 208:2 primary [1] - 209:2 probable [1] - 96:15 problem [1] - 28:5 problems [1] - 187:9 **Procedures** [1] - 203:22

procedures [1] - 203:23

proceedings [8] - 55:1,

80:24, 106:4, 163:17,

181:13, 253:5, 253:7,

PROCEEDINGS [1] - 1:16

Proceedings [2] - 2:16,

253:11

252:3

process [9] - 20:15, 20:20, 23:8, 32:23, 61:19, 68:15, 213:11, 233:6, 244:7 produced [4] - 8:21, 71:8, 190:15, 202:2 profanity [1] - 207:6 professional [8] - 17:1, 67:4, 67:16, 67:25, 196:23, 204:12, 213:5, 219:20 profile [1] - 249:10 program [1] - 41:6 prohibited [1] - 217:18 promoted [3] - 202:24, 203:6. 203:16 prompt [1] - 21:21 promptly [1] - 9:9 **proof** [2] - 8:5, 217:15 proofread [5] - 43:10, 43:12, 44:16, 46:23, 49:1 proofreading [2] - 45:23, 48:22 proper [1] - 249:20 property [1] - 225:8 prosecution [3] - 237:11, 238:15, 245:19 prosecutor [2] - 233:8, 238:13 protective [3] - 122:1, 122:13, 205:10 prove [2] - 236:20, 251:1 provide [8] - 7:11, 38:25, 44:13, 93:8, 94:11, 98:3, 98:7, 228:5 provided [17] - 79:25, 81:16, 82:24, 83:14, 85:23, 97:24, 98:6, 98:10, 127:15, 130:5, 142:22, 145:6, 181:22, 218:10, 230:16, 243:4, 247:17 providing [2] - 141:15, 247:12 provisionally [1] - 242:12 provisions [1] - 242:8 provoking [3] - 118:23, 139:3, 139:7 pry [1] - 72:7 psychological [1] - 244:8 psychologically [1] - 170:18 psychologist [1] - 76:18 psychotic [3] - 76:12, 76:17, 77:2 public [1] - 38:19 **puff** [1] - 247:4 punch [1] - 224:3 purely [1] - 24:4 purported [9] - 6:25, 96:22, 99:16, 101:5, 127:17, 139:14, 245:18, 245:22, 248.14 purportedly [2] - 125:12,

196:13 purpose [15] - 42:9, 43:6, 45:21, 70:23, 95:7, 119:17, 122:19, 155:1, 156:9, 207:14, 225:19, 228:19, 233:25, 250:6, 250:15 purposes [4] - 145:18, 155:14, 155:20, 236:19 put [32] - 47:8, 47:12, 47:15, 47:23, 48:2, 48:20, 48:21, 80:21, 85:7, 127:11, 131:1, 135:9, 136:25, 139:22, 140:9, 140:12, 141:7, 141:9, 144:24, 144:25, 148:5, 149:16, 154:9, 155:17, 170:11, 174:19, 195:14, 196:17, 197:12, 215:16, 242:7, 247:25 putting [3] - 140:22, 245:25, 248:9

Q

quality [1] - 48:22 questioned [2] - 138:7, 170:11 questioning [1] - 135:23 questions [43] - 9:10, 11:8, 20:15, 21:20, 23:1, 26:15, 26:18, 26:19, 33:21, 37:8, 43:25, 44:2, 51:22, 52:5, 57:1, 60:11, 60:13, 65:12, 69:5, 73:1, 80:20, 84:19, 88:1, 94:10, 136:10, 145:6, 145:10, 150:21, 164:8, 169:4, 171:6, 172:12, 178:10, 181:20, 185:5, 187:22, 197:16, 200:13, 218:5, 222:9, 230:5, 230:24, 233:16 quick [1] - 175:15 quite [9] - 12:16, 24:18, 26:3, 91:25. 123:9. 141:23. 145:13, 147:9, 171:15 quote [4] - 58:3, 62:19, 158:11, 241:22

R

radio [2] - 159:11, 159:12
raise [4] - 8:17, 71:5, 190:12, 201:22
raised [1] - 239:9
range [1] - 63:22
rank [2] - 10:8, 203:6
rather [1] - 104:20
re [1] - 168:16
re-ask [1] - 168:16
reach [17] - 30:25, 38:13, 39:9, 39:17, 42:7, 42:10, 45:9, 46:18, 87:12, 87:24,

118:14, 118:24, 119:4, 119:11, 122:12, 135:17, 195:22 reached [16] - 31:2, 39:13, 46:22. 47:4. 54:17. 54:18. 59:19, 60:9, 60:12, 74:22, 75:2, 96:18, 121:17, 123:23, 123:24, 218:21 reaches [1] - 240:24 reaching [10] - 34:18, 34:23, 37:18, 44:6, 44:25, 46:2, 48:17, 75:4, 75:10, 119:15 react [1] - 233:19 reacts [1] - 248:4 read [31] - 19:15, 27:7, 27:8, 51:14, 51:17, 51:21, 56:10, 56:11, 57:21, 57:25, 61:25, 62:5, 80:18, 85:21, 86:2, 111:22, 124:5, 147:7, 149:3, 150:23, 151:3, 172:18, 172:20, 172:21, 173:13, 232:16, 232:17, 234:14, 249:23 reader [1] - 166:25 reading [8] - 64:25, 107:21, 108:3, 143:17, 157:18, 157:24, 166:23, 228:3 reads [1] - 227:21 ready [3] - 70:9, 117:12, 231:20 real [1] - 175:15 really [29] - 10:13, 25:11, 32:12, 43:14, 45:13, 91:14, 91:22, 104:5, 109:7, 111:17, 162:6, 166:6, 183:17, 192:20, 193:17, 193:20, 196:17, 212:7, 212:18, 219:6, 220:11, 233:17, 233:19, 245:14, 246:7, 246:18, 247:16, 249:14, 249:17 Reaper [9] - 216:16, 217:19, 218:14, 219:16, 219:17, 220:2, 220:4, 220:19, 222:13 Reapers [5] - 217:17, 219:10, 220:1, 220:23, 221:3 rear [2] - 112:9, 164:23 reason [20] - 15:3, 75:4, 75:23, 108:14, 113:22, 123:4, 134:2, 144:1, 144:2, 153:21, 157:2, 181:18, 193:15, 206:18, 209:2, 212:23, 213:1, 215:2, 237:6, 247:12 reasonable [2] - 88:20, 212:18 reasonably [1] - 244:5 reasons [3] - 72:2, 72:4,

153:24

recalcitrant [1] - 245:23 recanting [1] - 238:20 recants [1] - 238:16 receive [5] - 54:5, 83:8, 121:20, 177:17, 194:13 received [23] - 39:6, 43:8, 52:11, 60:19, 74:9, 116:2, 156:25, 161:15, 162:8, 194:9, 196:8, 205:2, 206:4, 207:1, 207:5, 207:8, 207:21, 208:5, 208:10, 209:13, 209:18, 222:24, 240:8 **RECEIVED** [2] - 5:3, 5:9 receiving [12] - 42:21, 42:22, 55:19, 77:18, 79:17, 98:23, 118:6, 122:19, 125:1, 137:5, 139:5, 177:12 recently [1] - 203:8 recess [4] - 70:5, 117:9, 164:13, 190:8 recognize [4] - 37:3, 90:4, 114:23, 215:21 recognized [6] - 233:25, 234:10, 240:14, 244:6, 250:10, 250:18 recognizes [1] - 240:4 recollection [49] - 13:18, 14:12, 14:19, 15:13, 19:11, 19:17, 19:19, 35:21, 36:2, 37:7, 57:23, 63:6, 64:2, 74:15, 74:18, 77:22, 79:23, 89:14, 89:16, 90:13, 90:15, 91:13, 91:15, 91:22, 93:1, 94:7, 97:11, 100:2, 100:5, 101:17, 104:20, 104:25, 105:1, 105:18, 109:14, 112:16, 114:12, 131:15, 134:10, 146:18, 153:23, 171:6, 178:25, 214:11, 214:16, 223:2, 224:5, 225:12, 228:16 recommend [1] - 230:10 Record [1] - 5:16 record [14] - 6:5, 27:8, 56:11, 117:11, 119:6, 124:5, 147:7, 164:12, 164:15, 190:10, 234:12, 234:13, 252:2, 253:10 recorded [4] - 153:17, 154:6, 154:23, 173:19 recording [5] - 153:18, 153:24, 155:1, 155:19, 225:24 **RECROSS** [3] - 4:3, 4:9, recross [2] - 68:4, 187:23 **RECROSS-EXAMINATION**

[1] - 188:1

redirect [5] - 63:12, 68:6,

167:24, 200:15, 230:25 **REDIRECT** [6] - 4:3, 4:9, 63:16, 68:10, 168:1, 200:17 refer [8] - 19:12, 22:23, 24:7, 35:6, 41:22, 96:7, 138:14, 234.22 reference [7] - 95:16, 102:25, 103:5, 116:1, 155:22, 156:15, 209:8 referencing [1] - 92:14 referring [11] - 78:2, 88:15, 99:13, 105:13, 109:7, 126:25, 152:5, 155:24, 156:3, 182:19, 248:13 reflected [1] - 109:16 reflects [1] - 200:25 refresh [26] - 13:18, 14:12, 14:19, 15:13, 19:19, 35:21, 36:2, 37:7, 63:6, 64:2, 79:23, 89:16, 91:22, 94:7, 100:2, 100:5, 101:17, 105:18, 114:12, 134:10, 146:18, 153:23, 171:6, 214:11, 214:16, 224:5 refreshed [1] - 94:10 refreshes [5] - 19:16, 57:23, 91:12, 91:14, 178:25 regard [14] - 35:2, 43:7, 50:8, 79:20, 87:13, 139:25, 153:24, 196:9, 196:25, 205:1, 207:9, 207:20, 213:17, 236:12 regarding [10] - 38:18, 39:10, 75:9, 81:13, 91:16, 143:3, 145:6, 174:4, 217:6, 239:10 regards [3] - 49:11, 78:8, 109:12 regular [4] - 115:17, 214:6, 214:12, 214:19 rejected [5] - 45:25, 46:4, 46:9, 65:6, 65:10 rejecting [1] - 46:7 relate [1] - 182:3 related [4] - 34:16, 187:6, 204:18, 210:25 relates [1] - 72:4 relation [7] - 10:22, 32:2, 108:21, 155:20, 157:15, 181:6. 196:1 relationship [92] - 11:9, 13:23, 17:15, 17:23, 19:7, 19:10, 19:20, 19:25, 20:2, 20:7, 20:24, 21:8, 23:6, 23:25, 25:6, 26:9, 26:11, 26:12, 33:4, 33:7, 33:17, 50:25, 54:12, 54:21, 59:22, 60:1, 60:16, 68:13, 68:23, 74:20, 74:23, 79:20, 79:21,

80:22, 81:20, 81:22, 90:7, 91:24, 92:1, 93:3, 97:13, 97:19, 97:21, 97:22, 97:24, 98:2, 98:12, 99:5, 99:12, 107:18, 107:20, 107:22, 108:4, 108:7, 108:14, 109:19, 109:24, 110:6, 110:10. 110:14. 110:18. 110:22, 112:16, 113:2, 123:18, 135:3, 135:7, 135:12, 136:25, 144:9, 144:19, 170:21, 171:20, 177:14, 185:21, 192:16, 210:25, 223:16, 227:9, 228:24, 228:25, 229:5, 229:9, 229:11, 229:18, 229:19, 229:21, 233:13, 241:7, 245:11, 247:11 relationships [1] - 213:3 relayed [3] - 68:24, 172:24, 174:7 relegated [1] - 247:22 relevance [6] - 33:10, 216:17, 216:22, 235:23, 237:16, 244:21 relevant [5] - 32:12, 220:16, 242:14, 246:1, 247:8 reliability [1] - 239:25 reliable [1] - 242:15 relieve [1] - 157:11 relieved [1] - 158:6 remain [1] - 67:24 remediation [1] - 41:18 remember [98] - 13:15, 16:3, 18:10, 19:3, 19:5, 22:11, 23:4, 23:18, 25:8, 26:7, 30:12, 30:17, 32:4, 35:20, 38:16, 42:20, 42:21, 42:22, 46:14, 46:16, 50:21, 51:8, 55:3, 56:7, 56:20, 57:20, 59:9, 60:4, 60:12, 60:23, 61:2, 61:5, 61:23, 62:17, 77:15, 79:15, 79:16, 82:12, 85:2. 87:5. 87:6. 89:1. 90:8. 90:17. 92:2. 97:4. 102:22, 103:7, 104:8, 104:9, 104:10, 107:1, 107:2, 107:8, 110:16, 117:22, 127:22, 131:11, 131:22, 133:6, 133:10, 133:12, 136:4, 136:5, 143:17, 144:1, 145:8, 145:20, 148:23, 152:18, 153:19, 155:8, 156:22, 157:14, 158:7, 158:10, 158:15, 158:21, 159:2, 159:22, 160:3, 160:7, 162:21, 173:1, 175:22, 179:22, 181:19, 182:9, 184:22, 185:24, 188:21,

193:5, 194:17, 198:1, 198:5, 199:5, 200:7, 209:10 remembered [1] - 194:19 remind [1] - 177:10 removing [2] - 197:2, 197:13 reopen [1] - 70:20 repeat [5] - 55:15, 57:24, 61:15, 147:2, 191:18 repeating [1] - 21:4 repercussions [1] - 241:8 repetitive [3] - 37:10, 37:13 rephrase [4] - 20:18, 140:14, 208:23, 211:9 replied [1] - 52:16 replies [1] - 92:19 reply [1] - 52:16 report [131] - 35:3, 35:6, 35:9, 38:14, 39:3, 39:10, 39:25, 40:1, 40:3, 40:8, 40:15, 40:21, 40:25, 41:18, 42:13, 42:17, 43:10, 43:14, 44:9, 44:11, 44:12, 44:14, 44:16, 45:11, 45:13, 45:18, 45:24, 46:8, 47:2, 47:8, 47:12, 47:16, 47:20, 47:23, 47:25, 48:20, 48:23, 58:13, 59:20, 64:6, 64:21, 64:23, 64:25, 65:6, 65:9, 79:10, 95:8, 96:15, 96:20, 97:3, 97:14, 98:18, 99:1, 108:3, 127:10, 130:3, 130:6, 130:19, 130:21, 131:17, 132:6, 132:18, 132:24, 133:11, 133:16, 133:23, 134:3, 134:5, 134:18, 134:23, 135:2, 135:9, 135:16, 136:25, 140:12, 143:3, 143:5, 145:7, 146:22, 147:22, 148:1, 148:2, 148:4, 148:11, 148:14, 148:17, 148:21, 149:3, 149:7, 149:9, 149:10, 149:19, 150:6, 151:17, 151:24, 152:6, 152:9, 152:22, 153:10, 154:10, 154:12, 154:15, 154:17, 155:4, 155:5, 155:21, 156:20, 164:20, 165:4, 165:12, 166:24, 167:8, 167:10, 172:16, 172:25, 173:4, 173:16, 175:4, 176:8, 176:20, 181:18, 181:23, 182:1, 189:7, 223:20, 227:4, 227:13, 228:6, 228:7, 248:2 Reported [1] - 1:23

Reported [1] - 1:23 reported [11] - 2:21, 99:19, 164:20, 165:12, 166:18,

222:17, 223:11, 224:25, 227:11, 228:9, 253:7 reporter [12] - 9:13, 10:12, 10:14, 27:8, 56:10, 56:11, 124:5, 130:11, 147:6, 147:7, 190:20, 202:8 REPORTER [7] - 1:25, 32:19, 40:18, 157:23, 191:18, 194:4, 253:20 Reporter [2] - 2:21, 253:3 REPORTER'S [1] - 253:1 reporting [1] - 179:2 reports [43] - 35:4, 35:7, 35:14, 35:19, 37:9, 37:19, 37:22, 41:8, 42:3, 42:8, 42:11, 43:12, 44:7, 44:18, 44:20, 44:23, 44:24, 45:1, 45:14, 45:22, 45:25, 46:4, 46:24, 47:5, 47:6, 47:7, 48:3, 48:16, 48:24, 49:1, 64:10, 65:10, 66:2, 87:14, 87:17, 88:2, 99:25, 100:20, 100:25, 120:13, 167:5, 189:14 representing [1] - 129:4 Republican [1] - 217:2 reputation [2] - 212:14, 219:21 request [5] - 38:7, 51:20, 53:2, 122:7, 179:3 required [1] - 248:11 requirement [1] - 246:11 residence [8] - 103:20. 105:9, 123:17, 131:18, 140:8, 147:24, 163:21, 163:23 residences [1] - 60:6 resignation [2] - 72:3, 72:21 resigned [3] - 71:23, 71:24, 72.10 resistant [1] - 245:12 resource [1] - 195:22 respond [4] - 152:15, 160:11, 201:6, 245:3 responded [1] - 152:10 **RESPONDENT** [2] - 1:12, 2:12 responding [1] - 91:6 response [16] - 20:14, 43:3, 57:1, 57:6, 62:14, 91:3, 98:23, 102:16, 124:25, 127:9, 153:2, 153:14,

169:3, 169:17, 186:17,

responsibility [1] - 245:10

responsible [2] - 235:10,

restaurant [2] - 101:10,

restraining [52] - 117:25,

186:19

245:9

121:21, 122:6, 122:20, 123:12, 125:15, 126:6, 126:11, 126:17, 126:22, 127:6, 127:12, 127:14, 127:15, 127:19, 128:2, 128:11, 128:17, 129:10, 130:16, 130:22, 131:2, 131:7, 131:9, 131:13, 131:23, 132:3, 133:24, 137:17, 137:24, 138:16, 138:23, 139:22, 140:10, 140:21, 141:2, 141:8, 141:16, 142:6, 142:13, 142:16, 143:16, 144:21, 178:1, 178:6, 178:15, 179:3, 179:13, 179:25 restricted [1] - 113:9 restriction [1] - 141:11 restroom [1] - 164:10 resume [2] - 117:12, 202:18 returned [3] - 12:25, 13:20, revealed [1] - 201:10 review [16] - 11:5, 62:4, 62:8, 63:20, 80:19, 81:2, 84:21, 94:8, 94:21, 146:14, 147:15, 148:14, 151:12, 151:24, 205:17, 224:19 reviewed [8] - 35:22, 83:3, 140:2, 148:11, 148:15, 230:4, 233:24, 238:5 reviewing [3] - 146:22, 147:21, 230:6 rewrite [1] - 251:9 [2] - 123:22, 183:10 ride [2] - 23:17, 74:4 ridiculous [2] - 91:11, 92:19 right-hand [1] - 172:15 Rights [2] - 222:3, 235:16 Risk [2] - 191:17, 191:21 risk [1] - 93:21 road [1] - 233:9 Roam [15] - 6:7, 9:17, 43:24, 50:11, 72:23, 146:14, 147:10, 147:18, 148:12, 148:15, 167:23, 188:21, 232:18, 237:20, 251:9 ROAM [154] - 3:4, 6:9, 6:13, 6:22, 7:3, 7:11, 8:8, 8:14, 8:16, 9:19, 9:22, 10:2, 13:16, 14:16, 14:22, 14:25, 15:6, 15:11, 15:22, 15:24, 17:10, 17:20, 18:16, 19:6, 21:6, 22:14, 23:5, 27:23, 29:3, 29:10, 29:23, 30:7, 30:13, 31:21, 32:10, 32:13, 33:6, 33:18, 33:21, 36:22, 40:6, 45:2, 49:4, 55:12,

118:5, 121:2, 121:14,

55:25, 63:13, 63:17, 65:11, 68:7, 68:11, 69:5, 69:13, 69:25, 70:2, 70:10, 70:20, 70:24, 80:10, 80:13, 85:24, 107:24, 111:14, 111:18, 111:22, 113:14, 119:6, 123:6, 133:1, 141:4, 146:1, 146:25, 149:11, 150:7, 152:23, 164:9, 165:6, 167:24, 168:2, 168:16, 168:18, 169:10, 169:14, 170:10, 170:22, 170:23, 180:1, 180:14, 180:17, 180:21, 181:4, 181:7, 181:16, 182:20, 182:24, 183:19, 184:9, 187:3, 187:21, 189:19, 189:25, 197:19, 197:22, 200:13, 201:15, 208:20, 211:6, 212:4, 213:21, 213:24, 214:15, 214:18, 215:4, 215:6, 215:10, 215:15, 215:19, 216:20, 217:4, 217:12, 217:19, 217:22, 218:1, 218:12, 220:16, 222:9, 222:12, 227:5, 227:10, 229:16, 230:24, 231:8, 231:14, 232:5, 232:14, 232:20, 232:25, 233:21, 233:23, 234:20, 235:11, 236:6, 236:9, 239:17, 239:19, 241:12, 241:15, 241:25, 242:5, 242:21, 244:17, 250:2, 250:4, 250:14, 251:22 Rock [3] - 122:23, 163:5, 163:11 rocky [1] - 229:25 rode [1] - 73:25 [2] - 202:1, 202:10 4] - 4:12, 5:5, 201:20, 202:9 role [1] - 126:16 romantic [2] - 67:8, 67:10 Room [1] - 2:18 roughly [1] - 63:24 route [1] - 247:24 rule [1] - 240:2 ruled [1] - 237:16 rumor [1] - 210:22

S

run [4] - 10:13, 187:16,

187:18, 193:18

safety [2] - 77:1, 139:19 Santa [1] - 76:9 sat [2] - 142:16, 198:2 save [1] - 7:24 saw [9] - 28:11, 29:22, 30:5, 33:14, 56:5, 66:13, 68:12,

123:20, 183:16 scared [2] - 18:20, 18:21 scenario [2] - 123:18, 188:3 scheduled [1] - 127:21 scheme [4] - 159:1, 175:21, 175:24, 176:2 school [1] - 41:1 scientific [2] - 239:24, 244:6 scintilla [1] - 248:7 scope [2] - 8:4, 148:9 scratching [1] - 234:6 screen [3] - 164:21, 168:6, 183:7 **screenshot** [1] - 184:12 screenshots [2] - 60:24, 61:3 scrutiny [1] - 180:24 **SCULLY** [297] - 1:3, 2:3, 6:4, 6:10, 6:15, 7:6, 7:12, 7:19, 8:9, 8:12, 8:15, 8:17, 8:25, 9:5, 9:8, 9:16, 10:1, 13:10, 15:20, 15:23, 16:11, 16:16, 16:23, 17:2, 17:4, 17:6, 17:18, 18:14, 19:2, 20:10, 20:22, 20:25, 21:3, 21:14, 22:7, 22:13, 23:2, 27:6, 27:9, 29:2, 29:5, 29:18, 30:2, 30:11, 31:20, 32:8, 32:11, 33:11, 33:22, 35:10, 36:8, 36:11, 36:15, 36:21, 40:9, 43:18, 43:24, 45:4, 49:6. 49:14. 53:3. 53:6. 53:10. 53:15. 53:19. 55:13. 56:2, 56:9, 63:11, 63:14, 65:13, 65:17, 65:21, 66:5, 66:8, 66:11, 66:16, 66:21, 66:25, 67:3, 67:7, 67:11, 67:14, 67:18, 68:3, 68:6, 69:4, 69:6, 69:9, 69:17, 69:22, 70:1, 70:3, 70:6, 70:9, 70:11, 70:17, 70:22, 71:1, 71:12, 80:4, 80:12, 86:1, 87:5, 89:7, 89:21, 90:4, 90:12, 94:18, 95:23, 100:14, 100:19, 101:24, 104:7, 104:10, 104:13, 104:18, 104:22, 105:22, 105:24, 106:1, 106:5, 108:2, 111:16, 111:21, 111:24, 113:16, 114:19, 116:17, 116:21, 116:24, 117:8, 117:10, 117:15, 123:8, 124:3, 124:6, 124:9, 124:11, 133:3, 134:2, 134:6, 134:20, 134:22, 135:20, 135:23, 136:2, 136:9, 136:24, 137:19, 141:6, 146:3, 147:2, 147:5, 147:8, 149:13, 149:20, 149:23, 150:5, 150:8,

151:5, 151:8, 152:25, 153:8, 155:24, 156:2, 156:12, 157:18, 160:22, 161:1, 161:4, 161:7, 161:12, 163:16, 164:11, 164:14, 164:18, 165:3, 165:8, 165:11, 165:15, 165:18. 165:20. 166:1. 166:9, 166:17, 166:23, 167:4, 167:13, 167:21, 167:25, 168:14, 168:17, 169:9, 169:13, 169:23, 170:13, 179:12, 179:23, 180:9, 180:12, 180:23, 181:5, 181:9, 181:14, 182:16, 182:21, 183:13, 183:22, 183:25, 184:4, 184:8, 185:25, 186:5, 186:7, 186:17, 186:21, 186:25, 187:23, 189:18, 189:20, 190:1, 190:4, 190:9, 190:19, 190:23, 197:17, 200:14, 201:12, 201:16, 201:21, 202:6, 202:11, 205:7, 205:9, 205:20, 208:22, 211:8, 212:6, 213:20, 215:1, 215:5, 216:19, 217:9, 217:13, 217:20, 217:23, 219:4, 220:20, 220:25, 221:8, 221:11, 221:15, 221:21, 221:24, 222:11, 227:3, 227:6, 228:11, 228:15, 228:20, 228:25, 229:6, 229:12, 229:14, 230:25, 231:2, 231:9, 231:12, 231:15, 231:23, 232:2, 232:8, 232:15, 232:21, 233:1, 233:22, 234:14, 234:24, 235:24, 238:10, 239:18, 241:10, 241:13, 241:19, 242:1, 242:6, 242:19, 242:22, 243:22, 245:7, 249:6, 250:3, 250:13, 251:19, 251:23, 252:1 Scully [2] - 2:20, 236:6 Scully's [2] - 169:3, 169:18 seat [2] - 9:2, 202:7 second [4] - 82:20, 156:17, 188:13, 197:15 **section** [10] - 7:15, 180:4, 234:9, 234:16, 237:21, 240:2, 241:21, 242:1, 242:24, 250:22 **security** [1] - 142:22 see [41] - 14:18, 19:16, 57:22, 62:23, 69:24, 79:10, 83:17, 89:15, 91:16, 100:2,

100:23, 106:17, 112:4,

123:14, 123:22, 124:15, 124:17, 124:18, 147:22, 156:12, 167:14, 167:16, 172:2, 172:19, 178:24, 180:3, 183:8, 183:20, 197:23, 199:21, 199:23, 201:7, 204:5, 209:18, 215:21, 217:14, 220:7. 222:7, 225:20, 234:24, 243:22 seeing [3] - 30:14, 124:20, 238:21 seem [1] - 196:18 sees [1] - 250:8 Segundo [40] - 3:11, 74:7, 105:10, 120:18, 131:11, 131:14, 131:20, 132:7, 133:14, 133:18, 134:12, 134:17, 142:5, 142:7, 142:10, 142:21, 142:23, 142:25, 143:3, 145:25, 146:15, 147:17, 147:21, 150:11, 151:17, 151:20, 154:22, 156:19, 157:14, 158:20, 159:8, 166:19, 172:10, 172:16, 175:4, 176:21, 188:5, 188:7, 241:4, 247:2 semantics [1] - 108:5 send [9] - 35:5, 35:8, 38:5, 44:16, 44:17, 57:15, 60:21, 90:23, 93:12 sending [38] - 52:21, 53:2, 53:21, 54:1, 54:2, 54:12, 54:21, 55:10, 55:21, 55:23, 56:13, 56:16, 58:24, 59:4, 59:13, 59:16, 96:14, 97:4, 100:24, 109:9, 114:6, 118:18, 119:3, 119:16, 119:20, 119:23, 120:2, 120:23, 125:6, 134:13, 134:25, 142:2, 157:6, 162:20, 176:12, 177:22, 177:23, 193:25 **Senior** [1] - 191:9 sense [3] - 46:7, 227:17, 250:20 sent [21] - 23:11, 23:12, 23:24, 28:12, 33:2, 38:2, 39:5, 43:2, 44:10, 60:20, 60:25, 74:17, 83:3, 90:7, 91:23, 102:11, 113:12, 160:9, 162:9, 176:16, 194:9 sentence [1] - 156:18 **sentiments** [1] - 162:13 separate [5] - 80:8, 95:17, 159:4, 228:16, 242:24 **SEPTEMBER** [2] - 1:6, 2:6 **September** [12] - 1:18, 2:19,

6:1, 13:24, 72:17, 163:7, 167:7, 167:10, 167:19, 168:19, 173:7, 240:21 sequence [2] - 47:24, 132:1 Sergeant [42] - 6:7, 9:17, 43:24, 49:24, 50:1, 50:11, 52:4, 52:10, 57:2, 58:2, 58:9, 58:16, 58:19, 61:4, 62:11, 72:23, 130:7, 130:9, 130:15, 132:21, 133:6, 133:10, 146:14, 147:10, 147:18, 148:12, 148:15, 159:5, 160:3, 167:23, 188:11, 188:14, 188:21, 195:7, 202:25, 207:18, 215:24, 232:13, 232:18, 237:20, 243:12, 251:9 sergeant [4] - 47:9, 132:5, 132:20, 132:22 Sergeant's [1] - 243:6 sergeants [1] - 46:5 series [1] - 149:4 seriously [1] - 167:1 serve [8] - 142:6, 142:10, 142:22, 143:16, 143:24, 144:2, 144:3, 144:6 served [5] - 142:7, 142:13, 142:15, 143:20, 144:22 service [7] - 5:17, 114:13, 115:2, 115:3, 115:7, 192:24, 214:10 Service [10] - 49:19, 49:23, 50:8, 73:19, 73:21, 73:24, 74:5, 206:12, 213:11, 237:21 **SERVICE** [2] - 1:1, 2:1 Services [2] - 129:20, 129:23 set [8] - 159:16, 160:5, 160:7, 180:8, 194:15, 196:9, 197:7, 253:6 seven [1] - 138:22 several [1] - 111:6 sex [8] - 122:25, 137:8, 139:8, 140:11, 146:9, 176:2, 179:6, 189:12 **shall** [2] - 239:23, 241:21 shame [1] - 149:25 **shampoo** [1] - 218:9 share [1] - 30:15 shared [1] - 198:3 sharing [1] - 28:21 sheet [3] - 114:13, 179:16, 179.19 Sheet [1] - 5:17 Sheriff [1] - 38:22 sheriff [23] - 10:9, 34:14, 34:19, 39:2, 40:4, 40:22, 82:14, 84:10, 112:24, 113:5, 113:7, 113:8, 121:20, 128:20, 150:17,

196:14, 196:21, 197:2, 197:9, 197:14, 209:24, 210:13, 240:8 SHERIFF [2] - 1:10, 2:10 sheriff's [1] - 210:14 **Sheriff's** [17] - 10:3, 10:9, 40:13, 40:16, 71:24, 76:9, 86:24, 102:4, 129:12, 154:13, 175:9, 203:20, 204:11, 206:16, 207:18, 209:7, 210:16 SHERIFF'S [3] - 1:10, 2:10, Sheriffs [1] - 129:2 sheriffs [4] - 194:1, 194:10, 195:15, 195:21 sheriffs' [1] - 128:21 shift [20] - 12:17, 13:23, 102:19, 103:1, 103:16, 105:4, 115:7, 115:16, 193:2, 193:6, 193:8, 193:9, 193:14, 194:1, 204:17, 206:19, 214:6, 214:8, 214:13, 214:19 shifts [1] - 193:11 shit [3] - 155:10, 156:21, 158:22 **shooting** [1] - 195:13 **short** [5] - 104:5, 164:9, 166:10, 193:19, 246:2 **shortly** [1] - 177:15 shot [1] - 250:2 **show** [7] - 14:22, 36:24, 83:9, 89:15, 205:4, 205:16, 214:12 showed [15] - 14:10, 14:11, 18:1, 25:9, 25:11, 32:16, 32:25, 79:24, 83:10, 101:18, 163:23, 164:2, 164:5, 214:10, 226:22 **showing** [2] - 33:13, 214:15 **shows** [5] - 14:7, 83:15, 94:23, 94:24, 94:25 sic [1] - 146:15 side [3] - 233:9, 242:12 sides [1] - 7:22 sight [1] - 233:10 sign [3] - 128:19, 129:5, 129.7 significance [2] - 16:13, 170:4 significant [6] - 161:17, 208:7, 221:19, 224:24, 235:23, 247:15 simple [1] - 43:21 sincerely [1] - 39:20 single [1] - 198:12 single-man [1] - 198:12 sit [5] - 9:1, 86:6, 201:21, 201:22, 223:3

sitting [2] - 175:25, 243:12 situation [4] - 38:17, 78:17, 79:8, 196:4 six [11] - 41:6, 41:17, 72:24, 73:8, 138:21, 138:24, 146:13, 146:22, 147:18, 151:16, 223:7 six-hour [3] - 72:24, 73:8, 146:13 **six-month** [1] - 41:6 **skills** [2] - 48:6, 64:13 sleeping [3] - 59:17, 123:2, sliding [14] - 96:6, 96:8. 96:23, 97:7, 98:15, 101:5, 126:25, 130:23, 138:15, 158:14, 164:23, 168:7, 169:6, 169:17 Slow [1] - 32:19 slow [2] - 10:15, 157:23 smear [1] - 219:2 [33] - 3:16, 10:22, 19:9, 19:17, 20:1, 26:21, 49:24, 50:1, 51:15, 52:4, 52:10, 56:23, 57:2, 58:2, 58:9, 58:16, 58:19, 60:18, 61:4, 62:7, 62:11, 74:2, 74:3, 133:10, 159:5, 160:3, 187:11, 188:11, 188:14, 215:7, 215:24, 216:3, 224:1 Social [1] - 232:22 solely [1] - 236:24 someone [15] - 29:16, 45:10, 64:25, 83:9, 110:10, 110:21, 132:23, 179:5, 195:22, 207:24, 212:1, 237:6, 237:21, 240:13, 246:8 sometime [9] - 13:4, 96:10, 103:10, 110:17, 120:21, 139:11, 147:18, 163:7, 188.4 sometimes [1] - 103:18 **somewhat** [1] - 233:6 sorry [36] - 16:11, 23:12, 29:25, 69:19, 72:18, 84:22, 89:7, 95:23, 106:3, 110:12, 112:11, 116:19, 119:6, 122:18, 123:6, 123:10, 128:8, 143:1, 151:5, 151:7, 157:20, 160:22, 165:8, 173:24, 191:18, 194:4, 194:5, 195:8, 205:8, 216:10, 220:10, 222:19, 225:17, 228:12, 236:6

sort [6] - 100:16, 208:3,

sorts [1] - 243:16

219:10, 219:11, 219:15

sound [5] - 35:19, 81:22,

118:2, 129:2, 143:11 sounded [2] - 76:5, 123:1 sounds [4] - 105:17, 116:14, 161:23. 163:3 South [15] - 34:25, 48:9, 87:22, 194:23, 195:17, 203:7, 203:13, 203:16, 204:7, 206:7, 209:15, 210:2, 216:14, 221:2, 221:5 **space** [3] - 178:16, 178:18, 179:15 **spare** [1] - 160:5 speaking [4] - 9:12, 9:13, 75:12 special [1] - 235:13 **Special** [10] - 84:9, 84:16, 84:24, 85:1, 85:7, 85:13, 85:18, 86:9, 113:12, 218:23 specific [19] - 23:16, 35:11, 90:13, 90:14, 92:22, 94:9, 97:12, 112:11, 124:17, 131:6, 131:24, 136:16, 136:21, 138:8, 138:9, 140:23, 166:15, 186:16, 227:16 specifically [14] - 18:8, 19:14, 38:13, 46:22, 61:13, 62:12, 88:25, 89:1, 92:8, 108:19, 171:25, 174:8, 225:10, 234:9 specifics [6] - 90:9, 93:4, 104:6, 135:13, 199:5, 229:13 speculate [1] - 104:19 speculation [8] - 19:1, 29:16, 30:10, 56:1, 69:2, 211:7, 214:25, 228:9 **spell** [4] - 9:1, 130:10, 190:20, 202:7 spelling [1] - 83:11 spent [2] - 31:11, 246:21 spilling [1] - 19:15 spoken [2] - 170:1, 232:23 spots [1] - 117:4 spouse [1] - 247:15 stabbed [1] - 248:18 **stadium** [1] - 248:13 stairs [1] - 246:13 stale [1] - 247:1 stalking [3] - 28:25, 29:14, 82.3 stamped [2] - 165:6, 172:15 stand [3] - 8:17, 128:23, 248:1 standing [1] - 137:7 standpoint [2] - 210:11, 237:17 stands [2] - 78:21, 128:24

stapled [1] - 94:14 Starbucks [1] - 26:10 start [5] - 7:22, 51:25, 66:3, 168:3, 190:5 started [14] - 6:12, 6:13, 12:14, 13:20, 13:22, 14:13, 20:4, 20:20, 24:1, 42:7, 115:16, 135:19, 137:5, 183:6 starts [5] - 56:23, 62:6, 150:24, 184:13, 236:15 State [2] - 237:4, 253:4 state [11] - 9:1, 15:4, 16:24, 76:5, 85:22, 148:4, 190:20, 202:7, 237:22, 241:4, 243.13 statement [10] - 58:8, 58:18, 58:20, 60:22, 85:5, 158:15, 175:16, 197:5, 211:5, 244:25 statements [3] - 147:16, 230:21, 241:3 stating [3] - 82:22, 83:12, 128:6 **Station** [47] - 10:10, 10:19, 11:22, 16:15, 32:17, 34:17, 34:24, 34:25, 39:2, 41:4, 45:10, 46:1, 46:5, 46:20, 48:9, 48:16, 60:9, 76:9, 84:4, 87:20, 87:22, 115:8, 122:15, 150:12, 192:10, 192:13, 192:23, 193:7, 193:16, 194:2, 194:15, 194:22, 194:23, 196:10, 196:22, 202:23, 203:3, 203:7, 203:13, 203:16, 204:7, 206:7, 210:2, 216:14, 221:2, 221:5 station [11] - 29:25, 30:6, 30:15, 186:11, 192:14, 195:4, 195:20, 198:6, 219:3, 221:6, 221:19 stationed [1] - 191:14 status [2] - 70:25, 71:21 **stay** [5] - 52:12, 52:15, 118:11, 129:5, 195:5 stayed [3] - 99:15, 108:10, 201:7 steal [1] - 77:4 stenographically [1] - 253:7 still [31] - 19:23, 21:23, 33:20, 57:12, 61:6, 67:14, 77:23, 82:14, 82:17, 87:10, 87:19, 99:9, 99:24, 100:7, 102:3, 110:5, 110:19, 110:21, 127:7, 134:13, 135:10, 137:11, 145:23, 165:17, 167:20, 170:14, 170:19, 181:15, 195:6, 244:1

stipulate [2] - 15:2, 243:15 stipulated [1] - 246:22 stipulation [1] - 15:7 stole [1] - 76:10 stood [2] - 142:7, 233:8 **stop** [6] - 52:18, 59:17, 111:7, 157:10, 226:10 stopped [1] - 12:19 storage [1] - 61:10 story [5] - 197:4, 198:23, 247:13, 248:14, 248:15 **stove** [2] - 238:17, 246:12 strangled [3] - 168:20, 200:1, 200:9 street [5] - 142:14, 142:17, 142:19, 142:20, 143:20 **strictly** [3] - 67:4, 237:18, 247:9 strike [19] - 27:11, 27:21, 38:9, 93:23, 100:12, 120:20, 124:1, 125:3, 128:19, 131:4, 140:13, 142:23, 150:3, 153:6, 193:23, 197:3, 242:13, 244:18, 244:21 strong [5] - 22:1, 235:9, 238:11, 240:10, 245:1 structured [2] - 44:21, 237.23 **Studios** [10] - 12:2, 12:16, 16:15, 38:23, 50:5, 78:2, 78:4, 82:18, 84:6, 101:10 study [1] - 249:22 stupid [1] - 162:23 subject [7] - 222:1, 222:7, 237:25, 242:13, 244:18, 244:22, 250:5 subjected [3] - 180:24, 234:1, 240:15 **subjective** [1] - 170:9 submission [2] - 249:22, 251:20 submit [1] - 35:15 submitted [8] - 85:19, 118:5, 118:15, 125:15, 138:4, 138:10, 138:17, 141:3 subpoena [1] - 50:14 subscribed [1] - 253:14 subsection [3] - 239:21, 241:20, 251:12 successfully [1] - 47:2 suffering [1] - 248:5 sufficient [2] - 242:14, 244:20 sufficiently [2] - 242:14, 244:22 suggest [3] - 31:22, 69:22, 170:20 Suite [1] - 3:5

summary [1] - 191:6

super [1] - 173:25 Superior [3] - 138:11, 138:17, 141:17 **supervision** [1] - 253:9 **supervisor** [1] - 79:8 **Supervisor** [1] - 191:9 support [1] - 179:2 surprised [1] - 25:11 sustain [3] - 27:11, 27:20, 212:7 sustained [13] - 29:2, 31:20, 32:9. 49:6. 69:4. 113:16. 147:8, 169:9, 208:22, 211:8, 212:20, 215:1, 215:5 swear [1] - 70:18 **sworn** [4] - 8:22, 71:9, 190:16, 202:3 [2] - 161:15, 162:8 **syndrome** [3] - 234:17, 234:19, 234:21 system [1] - 61:10

Т

tab [1] - 10:25

table [1] - 231:5

tactics [1] - 46:19 taint [5] - 219:10, 219:11, 219:15, 219:24 tainted [1] - 219:16 tattoo [8] - 217:19, 218:8, 219:3, 220:7, 221:6, 221:9, 221:12, 221:18 [2] - 117:17, 229:5 [140] - 4:7, 6:17, 11:9, <u>11:10</u>, 13:19, 14:11, 15:14, 16:18, 16:24, 17:14, 20:8, 20:16, 23:7, 25:10, 26:15, 27:1, 27:4, 28:11, 28:15, 29:12, 32:1, 32:2, 33:8, 33:13, 38:18, 51:5, 52:17, 52:23, 53:1, 53:11, 53:17, 53:22, 53:25, 54:1, 54:3, 54:22, 54:23, 55:3, 55:9, 55:17, 58:5, 58:25, 59:2, 59:7, 59:13, 59:15, 59:23, 59:24, 60:3, 60:20, 60:25, 61:13, 61:17, 61:22, 62:13, 63:7, 65:15, 66:8, 66:12, 67:12, 68:12, 69:24, 70:6, 70:7, 70:14, 71:3, 71:4, 71:5, 71:19, 80:14, 80:18, 81:3, 89:23, 94:20, 99:10, 101:25, 105:19, 114:20, 114:24, 115:12, 117:3, 132:2, 139:10, 141:1, 143:7, 143:10, 143:15, 145:5, 148:20, 150:14, 150:25, 151:10, 156:8,

156:16, 158:7, 168:3, 168:19, 169:15, 170:24, 176:20, 184:17, 189:21, 192:2, 193:3, 193:7, 193:15, 193:20, 194:13, 196:5, 196:9, 197:25, 200:1, 200:9, 200:19, 200:23, 201:3, 206:4, 208:10, 210:25, 211:2, 212:11, 213:13, 213:16, 214:2, 214:22, 215:3, 219:19, 223:8, 223:12, 223:19, 225:24, 230:1, 232:24, 233:23, 240:7, 241:3, 245:1, 245:8, 246:25, 248:14 [1] - 71:7 [11] - 5:18, 45:14, 49:11, 70:24, 199:11, 199:18, 218:13, 223:16, 227:11, 244:15, 250:9 teach [1] - 203:22 technique [1] - 239:24 telephone [3] - 115:21, 131:12, 131:14 Temple [2] - 2:17, 203:3 temporary [5] - 121:21, 122:6, 127:14, 178:15, 179:3 ten [3] - 50:24, 69:23, 186:3 tendency [1] - 10:13 tentacles [2] - 218:19, 218:21 term [6] - 82:1, 84:12, 168:12, 168:15, 234:2, 240:15 terminated [1] - 210:24 termination [1] - 230:20 terms [2] - 75:12, 219:7 testified [30] - 8:23, 17:17, 24:15, 56:4, 59:1, 70:14, 71:10, 95:13, 96:1, 109:25, 110:15, 115:23, 160:15, 162:2, 171:9, 173:8, 176:6, 177:7, 187:10, 190:17, 198:13, 200:5, 202:4, 212:12, 218:17, 219:20, 235:16, 247:5, 248:8, 249:2 testify [15] - 6:8, 7:16, 64:22, 65:1, 73:14, 73:20, 216:11, 233:25, 241:10, 243:16, 245:18, 245:21, 247:24, 250:15, 251:5 testifying [10] - 7:18, 8:4, 56:3, 92:2, 92:15, 117:22, 233:17, 243:18, 249:3,

49:19, 50:9, 50:12, 50:18, 51:10, 56:21, 57:8, 61:4, 74:4, 92:7, 104:20, 104:23, 107:14, 107:25, 108:6, 108:9, 109:17, 110:16, 117:19, 133:2, 141:5, 148:12, 149:7, 152:24, 153:22. 155:6. 160:7. 168:23, 170:8, 170:15, 171:1, 182:17, 182:22, 189:21, 198:9, 200:7, 216:10, 218:13, 221:25, 233:3, 233:4, 233:25, 234:5, 234:10, 234:25, 235:4, 235:12, 235:21, 235:23, 236:2, 236:14, 237:24, 238:12, 238:22, 239:10, 239:22, 241:23, 242:9, 242:13, 242:22, 244:2, 244:10, 244:18, 244:21, 245:4, 245:8, 246:4, 246:16, 247:21, 248:22, 250:4, 250:24, 251:11, 251:16, 253:7, 253:10 testing [1] - 84:13 **Text** [3] - 5:13, 5:14, 5:15 text [121] - 51:3, 52:11, 52:12, 52:14, 52:17, 52:21, 52:24, 53:6, 53:7, 53:10, 53:11, 53:22, 54:3, 54:4, 54:5, 54:12, 54:22, 55:10, 55:18, 55:23, 56:19, 57:5, 57:13, 57:16, 58:25, 59:4, 59:12, 59:16, 60:19, 60:24, 61:10, 74:9, 74:13, 74:16, 77:18, 77:20, 78:8, 79:18, 82:5, 82:9, 82:10, 83:2, 83:3, 83:6, 83:8, 89:4, 89:15, 89:25, 90:7, 90:23, 91:25, 92:6, 93:1, 93:5, 93:12, 93:14, 94:3, 94:8, 95:7, 95:12, 95:25, 97:8, 98:24, 99:22, 99:25, 100:24, 101:18, 102:11, 109:9, 113:18, 114:6, 116:1, 116:4, 118:7, 118:10, 118:19, 118:24, 119:2, 119:16, 119:20, 119:23, 120:2, 120:23, 121:18, 122:17, 122:18, 122:24, 124:25, 125:5, 127:9, 134:14, 134:25, 137:5, 139:5, 139:25, 141:19, 141:20, 142:3, 145:23, 146:24, 156:25, 158:23, 158:25, 160:9, 161:14, 162:7, 162:8, 162:20, 168:6, 175:18, 175:19, 176:6, 176:12, 176:16, 177:13, 177:17,

250:6

testimony [82] - 20:11, 21:1,

21:15, 22:23, 45:5, 49:8,

177:20, 179:13, 184:11, 184:24, 196:8 texted [6] - 32:22, 82:21, 95:9, 159:17, 166:11, 166:12 texting [5] - 52:18, 52:19, 53:13, 53:17, 127:9 texts [1] - 165:21 thanked [1] - 97:2 **THE** [149] - 1:1, 1:2, 1:6, 1:9, 2:1, 2:2, 2:6, 2:9, 9:3, 9:7, 9:15, 13:15, 16:14, 16:20, 17:1, 17:3, 17:5, 17:9, 17:19, 18:15, 19:5, 20:18, 20:23, 21:2, 21:5, 22:6, 22:11, 23:4, 29:21, 30:4, 30:12, 32:19, 32:20, 33:12, 35:16, 40:18, 43:23, 44:4, 53:9, 53:14, 53:18, 55:15, 56:8, 56:12, 65:16, 65:20, 66:1, 66:7, 66:10, 66:13, 66:19, 66:22, 67:2, 67:5, 67:9, 67:13, 67:16, 67:23, 69:8, 69:19, 70:8, 80:7, 80:15, 86:2, 87:6, 89:9, 90:6, 90:14, 96:3, 100:18, 100:21, 102:1, 104:9, 104:12, 104:14, 104:21, 105:1, 105:23, 105:25, 106:3, 114:21, 117:7, 123:11, 124:8, 124:10, 124:13, 133:5, 134:4, 135:6, 135:22, 136:5, 136:14, 137:2, 141:7, 146:6, 149:16, 149:22, 149:25, 157:23, 160:24, 161:2. 161:6. 161:10. 165:1, 165:10, 165:14, 165:17, 165:19, 165:25, 166:3, 166:14, 166:21, 167:3, 167:6, 167:16, 179:21, 183:14, 183:24, 184:2, 184:7, 186:2, 186:6. 186:9, 186:19, 186:24, 187:2, 190:21, 191:18, 191:20, 194:4, 194:5, 202:9, 205:21, 214:17, 220:24, 221:4, 221:10, 221:14, 221:17, 221:23, 228:14, 228:18, 228:24, 229:3, 229:10, 229:13, 231:7 theater [1] - 109:2 themselves [1] - 195:10 then-Sergeant [2] - 57:2, 61:4 theoretical [1] - 237:7 theoretically [1] - 233:17 theories [1] - 244:12

theory [2] - 233:18, 249:15

therefore [1] - 85:7 thermostat [1] - 106:2 they've [1] - 247:4 thinking [2] - 55:20, 222:1 third [5] - 62:24, 156:17, 172:18, 173:12, 227:19 thirds [1] - 157:22 thoughts [1] - 231:21 thousand [1] - 157:8 threaten [4] - 77:4, 128:10, 128:16. 162:5 threatened [11] - 72:20, 76:9, 76:10, 77:6, 100:9, 154:2, 154:4, 154:5, 218:14, 218:15, 223:20 threatening [6] - 154:8, 174:19, 174:22, 174:23, 228:7, 230:3 threatens [1] - 210:14 threats [1] - 208:18 three [11] - 12:6, 14:2, 59:21, 84:19, 108:11, 147:19, 151:3, 156:6, 191:8, 191:13, 203:7 three-clip [1] - 156:6 threesome [1] - 82:22 threshold [1] - 246:11 thresholds [1] - 246:1 throughout [1] - 218:19 throw [1] - 220:10 timely [1] - 206:21 Timex [1] - 218:9 timing [1] - 147:9 today [14] - 10:12, 50:13, 72:5, 86:6, 152:21, 188:17, 191:6, 201:17, 210:18, 218:17, 223:3, 225:22, 231:4, 231:10 together [26] - 10:14, 11:18, 11:21, 11:24, 12:16, 12:24, 13:19, 13:20, 14:13, 15:3, 15:5, 15:14, 16:10, 23:22, 51:2, 75:21, 93:3, 94:15, 98:10, 112:20, 117:19, 166:6, 166:7, 166:8, 192:1, 240:25 tomato [3] - 52:11, 52:15, 53:8 tomorrow [6] - 7:1, 232:5, 232:6, 232:9, 232:10, 232:12 tone [1] - 118:10 took [25] - 28:12, 33:1, 58:7, 61:3, 103:7, 103:12, 105:7, 133:10, 139:14, 145:7, 148:16. 148:18. 149:2. 149:4, 152:6, 152:9,

159:11, 164:21, 170:10,

170:14, 171:10, 184:2,

196:5, 209:21, 237:7

top [6] - 19:16, 22:4, 51:18, 51:25, 83:17, 94:23 total [1] - 36:12 totality [1] - 199:24 totally [1] - 73:10 touch [1] - 233:11 touched [1] - 121:25 tough [1] - 235:9 toward [1] - 51:4 towards [1] - 76:22 Towers [7] - 11:13, 11:16, 30:22, 51:2, 54:8, 75:22, 203:1 track [1] - 116:19 **traffic** [1] - 6:19 **train** [1] - 191:10 trained [1] - 240:8 trainees [1] - 204:6 **Training** [7] - 191:15, 203:17. 203:20. 203:25. 204:2, 204:10, 213:5 training [30] - 40:3, 41:3, 41:6, 41:9, 41:10, 41:13, 41:15, 41:21, 43:13, 44:22, 45:12, 46:11, 47:1, 47:15, 47:16, 48:4, 48:9, 48:15, 64:19, 64:20, 64:21, 84:3, 121:20, 121:23, 121:24, 198:2, 204:3, 235:8, 240:9 transactional [2] - 245:20, 247:25 transcribed [1] - 253:8 **TRANSCRIPT** [1] - 1:16 transcript [7] - 11:3, 11:6, 20:11, 133:9, 215:23, 224:1, 253:5 Transcript [1] - 2:16 transcription [1] - 253:9 transcripts [1] - 143:17 transfer [1] - 192:13 transferred [7] - 16:20, 78:15, 87:22, 194:22, 203:1, 203:4, 203:8 Transportation [1] - 129:23 transportation [2] - 16:21, 129:20 trapped [2] - 153:22, 241:6 trial [1] - 237:12 tried [6] - 18:2, 18:6, 93:17, 134:24, 164:22, 240:22 trier [3] - 240:5, 244:5, 244:24 tries [2] - 64:7, 64:12 trigger [1] - 176:7 tripped [1] - 246:12 **TRO** [4] - 5:18, 137:16, 178:19, 178:20 true [18] - 57:8, 58:8, 58:20,

113:6, 138:11, 138:12, 139:20, 139:21, 212:16, 253:10 trust [6] - 67:25, 68:19, 156:20, 175:6, 175:9, 175:12 truth [6] - 20:3, 20:4, 58:11, 58:21, 58:24, 204:22 truthful [4] - 26:21, 49:12, 52:8, 218:7 truthfulness [2] - 210:5, 212:14 try [12] - 38:11, 64:9, 65:4, 76:6, 105:18, 106:1, 140:14, 169:13, 246:17, 247:3, 247:18, 251:9 trying [26] - 12:22, 16:3, 18:11, 20:23, 21:8, 21:9, 24:10, 27:15, 35:25, 72:8, 95:15, 96:6, 99:16, 104:16, 109:23, 111:25, 112:8, 135:13, 155:16, 158:13, 225:21, 226:10, 237:13, 243:12, 246:5, 249:13 TSB [1] - 191:11 TSP [2] - 16:21, 129:19 **TST** [3] - 73:22, 74:4, 78:15 turn [21] - 42:23, 46:8, 47:20, 51:9, 51:14, 56:21, 61:24, 63:18, 84:18, 99:2, 150:19, 170:24, 172:8, 172:14, 172:17, 173:7, 173:22, 178:1, 184:10, 223:25, 224:2 turned [1] - 47:9 turning [2] - 19:13, 46:1 twice [1] - 185:21 Twin [7] - 11:13, 11:16, 30:22, 51:2, 54:8, 75:22, 203:1 **two** [54] - 9:5, 9:13, 14:1, 14:12, 15:16, 15:25, 25:10, 28:6, 39:14, 50:17, 53:15, 57:19, 59:21, 65:21, 67:8, 72:13, 75:14, 75:18, 75:23, 76:8, 80:19, 85:21, 87:10, 95:17, 105:9, 106:20, 112:21, 121:8, 122:11, 127:3, 127:4, 131:1, 133:12, 139:17, 144:15, 145:25, 149:5, 157:22, 180:5, 185:20, 203:5, 205:9, 207:12, 210:3, 210:4, 210:8, 216:7, 216:13, 218:5, 221:20, 229:24, 234:15, 235:14, 251:7 two-minute [1] - 106:20 two-thirds [1] - 157:22

two-year [2] - 185:20, 210:4

59:5, 59:6, 61:18, 62:16,

74:10, 85:15, 99:7, 107:14,

type [10] - 170:7, 204:17, 206:25, 210:14, 230:2, 234:4, 238:12, 238:14, 238:22, 239:10
typed [5] - 81:7, 91:13, 159:14, 160:1, 160:5
types [2] - 184:23, 240:15

U

ugly [1] - 33:3 ultimate [1] - 212:19 ultimately [3] - 176:8, 235:22, 240:16 uncommon [1] - 65:7 under [25] - 117:21, 138:10, 200:5, 206:7, 209:24, 210:1, 224:3, 236:1, 236:24, 237:19, 242:7, 242:19, 242:23, 243:3, 243:13, 243:16, 243:18, 243:20, 244:2, 246:2, 246:14, 248:23, 249:22, 251:20, 253:9 underpinnings [2] - 246:18, 247:20 understood [1] - 67:13 unfortunately [1] - 30:12 uniform [5] - 196:24, 200:6, 200:11, 200:21, 201:1 uninvited [2] - 136:7, 136:13 union [2] - 128:25, 129:4 **Unit** [11] - 3:5, 38:19, 78:19, 78:20, 79:6, 79:11, 83:15, 84:24, 99:2, 115:12, 191:21 unit [6] - 16:18, 16:21, 78:23, 84:10, 115:5, 129:18 units [2] - 206:22, 213:8 Universal [21] - 12:2, 12:16, 16:15, 38:23, 50:5, 78:2, 78:4, 82:18, 84:6, 101:10, 101:15, 102:4, 102:20, 103:17, 105:5, 108:22, 109:3, 112:19, 114:10, 122:15, 126:4 universal [1] - 115:11 unknown [1] - 99:17 unless [3] - 45:6, 161:8, 214.8 unlike [5] - 108:17, 167:20, 168:4, 169:4, 169:18 unlikely [1] - 100:6 unproven [1] - 239:25 unsuccessful [1] - 164:24 untouchable [1] - 175:12 untrustworthy [1] - 219:17 unusual [3] - 136:14, 208:3, 208:6 **up** [90] - 10:16, 14:11, 15:3,

16:1, 18:1, 24:23, 25:1, 25:9, 25:11, 25:17, 25:19, 25:23, 26:3, 26:10, 36:6, 47:25, 57:7, 57:10, 61:13, 61:19, 61:21, 62:13, 63:8, 66:12, 66:17, 68:7, 68:15, 76:15, 77:5, 80:2, 80:7, 81:7. 94:13. 101:9. 101:11. 101:14, 101:20, 102:10, 102:13, 103:24, 104:25, 105:20, 107:13, 108:21, 108:24, 109:15, 112:19, 114:15, 117:5, 124:10, 125:16, 126:4, 126:18, 127:4, 130:18, 134:9, 134:17, 135:8, 136:12, 137:1, 147:9, 157:2, 163:23, 164:2, 164:5, 166:5, 166:7, 180:3, 188:11, 188:14, 202:22, 205:5, 207:19, 217:10, 217:11, 222:6, 223:6, 227:17, 227:23, 229:22, 229:24, 237:3, 238:17, 240:22, 241:9, 245:17, 246:7, 247:4 upload [1] - 61:9 upset [5] - 25:12, 33:17, 176:24, 183:17, 186:15 Urth [1] - 198:2 uses [1] - 218:9

V

vague [1] - 146:2

vaguely [1] - 217:10 [1] - 82:23 **valid** [2] - 244:7, 244:8 Valley [1] - 121:2 various [6] - 46:24, 54:2, 58:25, 59:16, 60:19, 202:21 vehicle [2] - 193:25, 196:6 verbally [2] - 224:21, 224:25 verbatim [1] - 85:23 verbiage [1] - 208:12 **Verizon** [2] - 106:6, 171:2 versa [1] - 244:1 verses [1] - 236:16 via [3] - 34:11, 82:5, 82:9 vice [1] - 244:1

245:22, 247:7, 248:14, 249:10 victims [8] - 122:7, 148:4, 233:2, 233:7, 239:2, 239:13, 243:2, 244:13 Victims [10] - 84:9, 84:16,

victim [12] - 135:4, 237:14,

238:16, 238:20, 244:9,

244:12, 245:10, 245:18,

85:18, 86:9, 113:12, 218:23 video [7] - 112:10, 112:13, 169:16. 199:14. 199:21. 225:24, 226:22 video-recording [1] - 225:24 videos [1] - 199:22 videotaped [1] - 226:4 videotaping [1] - 226:6 view [1] - 212:12 viewpoint [1] - 221:14 violated [1] - 68:19 violates [2] - 222:3, 251:12 violation [2] - 230:6, 230:8 violence [43] - 167:7, 167:9, 167:19, 168:5, 168:11, 168:15, 198:22, 199:9, 233:2, 233:7, 233:14, 233:18, 235:1, 235:13, 235:18, 237:10, 237:14, 239:2, 239:14, 240:5, 240:19, 240:20, 240:23, 243:3, 243:9, 243:19, 244:13, 245:22, 246:9, 246:23, 247:7, 247:9, 247:19, 248:4, 248:16, 248:20, 249:10, 249:12, 249:19, 250:7, 250:11, 251:6 visit [1] - 195:3 visual [1] - 142:18 voque [1] - 234:21 voice [1] - 10:16 volatile [2] - 135:7, 166:4 volume [1] - 36:1 voluntarily [3] - 128:14, 129:7, 161:8 voluntary [1] - 248:25 volunteer [1] - 28:14 vouch [1] - 212:9 vouching [3] - 237:1, 238:4, 249:5

84:24, 85:1, 85:7, 85:13,

W

W-i-a-r-d [1] - 119:7

wait [6] - 20:10, 30:2, 40:18, 104:22
waiting [1] - 214:1
wants [6] - 35:11, 231:16, 237:2, 237:20, 241:7, 251:9
warrant [1] - 246:15
wash [2] - 29:22, 29:25
Watch [5] - 195:7, 203:13, 207:25, 219:22, 221:2
watch [5] - 46:5, 47:9, 142:18, 218:9, 227:24

watched [1] - 142:17

watching [2] - 137:12, 183:6 wave [1] - 247:19 ways [1] - 249:16 wears [1] - 218:9 Wednesday [4] - 1:18, 2:19, 6:1, 115:6 week [2] - 97:10, 108:11 weekend [1] - 157:1 weight [5] - 196:17, 218:3, 235:21, 245:6, 248:12 West [44] - 2:17, 10:10, 10:19, 11:21, 11:25, 16:4, 16:14, 32:17, 34:17, 34:21, 34:24, 38:22, 39:2, 41:3, 41:9, 43:4, 43:15, 45:10, 46:1, 46:5, 46:20, 48:16, 60:9, 84:3, 87:20, 115:7, 122:15, 150:12, 159:10, 191:12, 191:16, 192:1, 192:4, 192:6, 192:10, 192:13, 192:23, 193:7, 193:16, 194:2, 194:15, 194:22, 196:10, 196:21 whatsoever [2] - 217:8, 219.1 whole [8] - 198:23, 199:23, 199:24, 222:1, 222:7, 229:1, 236:3, 239:5 whore [3] - 31:4, 31:13, 60:14 Wiard [38] - 78:16, 79:4, 79:11, 79:13, 79:25, 81:6, 81:10, 81:15, 82:6, 82:25, 83:14, 83:20, 84:23, 85:11, 85:23, 86:7, 86:15, 97:14, 97:25, 98:3, 98:22, 99:1, 107:16, 109:24, 110:13, 118:16, 118:24, 119:5, 119:7, 119:8, 119:11, 119:15, 120:17, 121:11, 124:19, 129:11, 129:13, 154:17 WIARD [1] - 79:4 wife [2] - 82:21, 233:8 willing [2] - 45:15, 245:14 willingness [1] - 203:22 wind [1] - 246:7 window [4] - 112:9, 164:22, 171:11, 247:10 Wireless [2] - 106:6, 171:2 wise [2] - 25:14, 195:17 wish [1] - 243:12 withdraw [2] - 168:16, 215:4 withdrawing [1] - 238:20 withheld [1] - 141:2 WITNESS [134] - 9:3, 9:7, 9:15, 13:15, 16:14, 16:20, 17:1, 17:3, 17:5, 17:9, 17:19, 18:15, 19:5, 20:18,

20:23, 21:2, 21:5, 22:6,

22:11, 23:4, 29:21, 30:4, 30:12, 32:20, 33:12, 35:16, 43:23, 44:4, 53:9, 53:14, 53:18, 55:15, 56:8, 56:12, 65:16, 65:20, 66:1, 66:7, 66:10, 66:13, 66:19, 66:22, 67:2, 67:5, 67:9, 67:13, 67:16. 67:23. 69:8. 69:19. 70:8, 80:7, 80:15, 86:2, 87:6, 89:9, 90:6, 90:14, 96:3, 100:18, 100:21, 102:1, 104:9, 104:12, 104:14, 104:21, 105:1, 105:23, 105:25, 106:3, 114:21, 117:7, 123:11, 124:8, 124:10, 124:13, 133:5, 134:4, 135:6, 135:22, 136:5, 136:14, 137:2, 141:7, 146:6, 149:16, 149:22, 149:25, 160:24, 161:2, 161:6, 161:10, 165:1, 165:10, 165:14, 165:17, 165:19, 165:25, 166:3, 166:14, 166:21, 167:3, 167:6, 167:16, 179:21, 183:14, 183:24, 184:2, 184:7, 186:2, 186:6, 186:9, 186:19, 186:24, 187:2, 190:21, 191:20, 194:5, 202:9, 205:21, 214:17, 220:24, 221:4, 221:10, 221:14, 221:17, 221:23, 228:14, 228:18, 228:24, 229:3, 229:10, 229:13, 231:7 witness [47] - 6:8, 6:16, 6:24, 6:25, 7:5, 7:7, 7:23, 7:25, 8:2, 8:12, 8:21, 9:17, 21:13, 27:10, 70:18, 71:8, 123:7, 147:10, 149:12, 170:5, 170:7, 189:23, 189:25, 190:2, 190:10, 190:15, 201:19, 202:2, 231:13, 231:18, 231:22, 231:24, 235:4, 236:25, 238:3, 238:4, 241:23, 242:8, 243:1, 243:3, 245:3, 245:13, 246:6, 247:16, 247:23, 249:4, 251:10 WITNESSES [2] - 4:3, 4:9 witnesses [6] - 21:25, 219:13, 219:18, 220:1, 231:10, 242:25 woman [7] - 234:16, 234:19, 234:21, 235:9, 240:10, 240:14, 245:1 women [1] - 234:1 wondering [1] - 234:7 word [7] - 6:19, 34:13, 148:3,

184:3, 209:21 words [4] - 10:14, 92:20, 137:7, 170:1 Worker [1] - 232:22 worker [1] - 221:20 workers [3] - 54:9, 54:10, 118:12 worksheet [2] - 14:4, 14:7 worksheets [4] - 14:10, 14:18, 15:8, 15:12 world [1] - 174:16 worry [1] - 184:13 write [25] - 35:4, 37:19, 39:25, 42:8, 42:10, 42:11, 44:7, 45:14, 45:17, 47:5, 47:6, 47:12, 64:9, 64:10, 87:17, 96:20, 99:25, 148:3, 149:18, 155:21, 224:16, 225:19, 228:13, 228:14, 228:19 writer [1] - 65:9 writing [37] - 35:3, 35:9, 39:3, 40:2, 40:3, 40:8, 40:15, 40:22, 40:25, 41:18, 42:3, 42:12, 42:13, 43:14, 44:11, 44:12, 44:23, 44:24, 45:11, 45:13, 45:18, 45:24, 47:2, 47:20, 48:6, 58:13, 64:6, 64:8, 86:15, 86:18, 87:14, 88:2, 97:3, 100:24,

Υ

127:10, 135:2, 141:12

written [4] - 7:12, 7:16,

wrote [16] - 28:11, 44:9,

47:6, 137:24, 138:9,

138:13, 138:16, 148:21,

152:21, 153:10, 179:14,

149:6, 149:8, 149:10,

151:24, 178:4

212:24, 228:12

year [6] - 13:3, 185:20, 191:10, 191:11, 210:4, 241:6 years [24] - 42:12, 59:21, 75:16, 75:17, 77:7, 77:10, 79:15, 87:6, 133:12, 191:8, 191:13, 202:21, 202:24, 203:5, 203:7, 210:3, 210:8, 216:7, 216:13, 223:4, 229:24, 251:7 yelling [2] - 207:6, 227:22 yesterday [1] - 183:15 yourself [18] - 19:15, 41:22, 41:24, 43:20, 51:17, 51:22, 62:1, 64:10, 73:24, 80:18, 86:4, 88:7, 150:23, 151:3, 172:21, 173:13, 192:24, 202:18 yourselves [1] - 12:8

YouTube [1] - 199:23

Ζ

[1] - 130:12 [3] - 130:7, 130:9,

zero [1] - 245:12